

1 A.B. Nelson

2 list to Judge Aaron. If he has other
3 stuff on that document, I'm going to
4 want to ask him about it.

5 MS. LILBURN: Sure.

6 MR. HANS: If he has other
7 information, because I don't know what's
8 on it.

9 MS. LILBURN: We will see what is
10 in the document. He may want to make a
11 correction to the damages claim.

12 MR. HANS: I will cover what I
13 can, but I don't know what he sent.

14 MS. LILBURN: So noted.

15 Q You have \$250,000 for
16 termination. How did you arrive at that?

17 MS. LILBURN: Objection.

18 Q What was the basis of putting
19 down \$250,000 for termination?

20 A Because it was a wrongful
21 termination, wrong in the worst way, so being
22 a pro se litigant, I came up with that number.

23 Q So this was just a number that
24 you came up with?

25 A Yes, based on other cases and

1 A.B. Nelson

2 different things that I might have read.

3 Q When were you terminated?

4 A When was I terminated?

5 Q Yes.

6 A I was terminated September -- not
7 September. I was terminated September -- it
8 happened two days before the EEOC.

9 Q EEOC is dated June 2017.

10 A September 21, 2017 it is dated.
11 That's a day or two after the fight took
12 place, after I was subjected to whatever in
13 the Sunoco station and the fight that happened
14 inside the office.

15 Q That was September 2017?

16 A Yes.

17 Q But you went back to work for
18 them a month later?

19 A Yes, and I also explained to you
20 that the EEOC gives you --

21 Q Let me interrupt you. Let us put
22 aside the EEOC. Whatever the rules are, the
23 rules are. I understand what you told me.

24 What I'm saying is, you are saying there was
25 an act of termination. Is it your testimony

1 A.B. Nelson

2 that the act of termination was that incident
3 at the Sunoco station?

4 A Yes.

5 Q But yet you came back to work
6 voluntarily as to what you testified to was a
7 month later?

8 MS. LILBURN: Objection.

9 Q Yes or no? Did you go back to
10 work?

11 Did you go back to work after the
12 incident that you claim you were terminated?

13 A I was asked to come back to work
14 three or four weeks later.

15 Q Would I be correct in saying that
16 you were not terminated?

17 A No, you would not.

18 MS. LILBURN: Objection.

19 Q What is your testimony with
20 respect to being terminated and rehired or
21 hired? Can you explain how you got terminated
22 and then you went back to work? Can you
23 explain that to me?

24 A Sure.

25 Q I understand you got called a

1 A.B. Nelson

2 month later, but you're saying you got
3 terminated. It is my understanding when
4 people get terminated, that's it, but that
5 does not seem to be the case with you,
6 correct?

7 MS. LILBURN: Objection.

8 A They did terminate me.

9 Q At the Sunoco station?

10 A Exactly.

11 Q Did you go back to work?

12 A They asked me to come back to
13 work, so I decided to come back to work, but
14 that does not say that I wasn't terminated or
15 to the witness statements that people that saw
16 what happened I was terminated.

17 Q When you came back to work, how
18 long did you work for Victory after that?

19 A I worked up until August 29th,
20 whatever that Friday is before Labor Day
21 weekend.

22 Q Of 2018?

23 A Yes, 2018, either the 28th or the
24 29th. If somebody can pull up a calendar --

25 Q What happened around that time?

1 A.B. Nelson

2 Did your employment cease at that time? Did
3 your employment stop at that time?

4 A It stopped.

5 Q Why did it stop?

6 A It stopped because I could not
7 take no more the crap. I was tired of Alex's
8 racial remarks, this guy's age old remarks,
9 the Bill Cosby stuff starting up again. I had
10 it up to here with it.

11 Q At that point in time when you
12 had enough of it, did you ever go to Diane or
13 Phil and discuss that with them?

14 A I told you 100 times before that
15 I was instructed not to go and that hasn't
16 changed from an hour ago.

17 Q As of August of 2018, you had
18 been to the EEOC, correct?

19 A What was that?

20 Q As of August 2018, you already
21 filed with the EEOC; is that correct?

22 A I had to update the file. There
23 was a problem at the EEOC which I explained to
24 you that the person retired and they had to
25 give me a new investigator.

1 A.B. Nelson

2 Q That is not what I am saying. If
3 you look at Exhibit B, it is dated June of
4 2018.

5 A Exactly.

6 MR. HANS: Off the record.

7 (A discussion was held off the
8 record.)

9 Q The Richard Simon letter is dated
10 September 2018, which is right around the time
11 or after the time that you say that you left.

12 A About two weeks after.

13 Q Do you know if Victory received
14 the June 29th EEOC filing that you made in
15 June of 2018? Do you know if they received it
16 around June of 2018?

17 A It was sitting there waiting for
18 me to get another job and when I had
19 everything -- it was sitting there.

20 Q When you say sitting there,
21 where?

22 A The EEOC, because you're not
23 going to send someone to investigate your job
24 until you have another job.

25 Q The stamp on Exhibit B says June

1 A.B. Nelson

2 29, 2018 it was received. Would you agree or
3 disagree with the fact that it is up to the
4 EEOC to send out a complaint after you file
5 it?

6 MS. LILBURN: Objection.

7 A That is not how it works.

8 Q Tell me how you think it works?

9 A It's how I know it works. They
10 give you 180 days.

11 Q That is not what I am asking.
12 After you filed the complaint, do you know if
13 it is your obligation or their obligation to
14 send it to the employer?

15 A It is my obligation to tell them
16 when to send it to the employer.

17 Q So it was received June 29, 2018.
18 Did there come a time after that that you told
19 them to send it to the employer?

20 A Yes.

21 Q How did you do that? Did you
22 call them up and say send it?

23 A I believe I was down there. I
24 went to Whitehall Street. I was at Whitehall
25 Street numerous amount of times.

1 A.B. Nelson

2 Q Did you tell them at some point
3 in time in August of 2018 you wanted that
4 complaint sent to the employer?

5 A I told them to not send it until
6 I secured another job.

7 Q We talked before about the
8 interrogatory response where Chris Orsaris at
9 Victory implemented a scheme where the
10 salespeople would end up owing money. We
11 talked about that. Would you agree it was a
12 fairly important fact and absolutely wrong for
13 the employer to do?

14 MS. LILBURN: Objection.

15 Q Would you agree on that?

16 A That it's wrong to do that?

17 Q Yes. Is it a fairly important
18 fact that they implemented the scheme?

19 A Very important.

20 Q Being this was very wrong, why
21 was that fact not included in your EEOC
22 complaint or your complaint in this case?

23 A In the EEOC complaint, I believe
24 that activity started -- it might have started
25 after I filed that complaint.

1 A.B. Nelson

2 Q Between June 29th and the time
3 you filed -- you filed the complaint June 29th
4 and the time that you filed this complaint,
5 that is the time that they implemented the
6 scheme that the salespeople would end up owing
7 them money?

8 A You're saying is it after?

9 Q This is not a trick question.

10 A Repeat the question.

11 Q You said that the scheme was
12 implemented after you filed your EEOC
13 complaint. I am saying you filed your EEOC
14 complaint June 29th. You left the job in
15 August, the end of August. Was the scheme
16 implemented during that period of time?

17 A It might have been implemented
18 before. What's the period of time, because
19 June 29th is when they received -- when I went
20 back down.

21 Q Mr. Nelson, you're not
22 understanding my question. My first question
23 is why was such a big fact that you agreed
24 moments ago was a fairly important fact, so
25 why was that fact not included in either your

1 A.B. Nelson

2 complaint or the EEOC complaint?

3 MS. LILBURN: Objection.

4 MR. HANS: What's the objection?

5 MS. LILBURN: Are we talking

6 about the EEOC complaint or are we

7 talking about his lawsuit?

8 MR. HANS: Both. Either one.

9 MS. LILBURN: It is in his
10 complaint.

11 MR. HANS: It is not. If he
12 thinks it is in the complaint, then he
13 can tell me.

14 MS. LILBURN: This EEOC complaint
15 charge of discrimination, Mr. Nelson
16 already testified that the scheme has
17 nothing to do with his discrimination
18 claims.

19 MR. HANS: I know that.

20 Q Did you believe that the scheme
21 had nothing to do with discrimination; is that
22 correct?

23 A It has nothing to do with it.
24 They robbed everybody the way they wanted to.

25 Q The statements you put in your

1 A.B. Nelson

2 interrogatories about the Dominicans, where
3 the letter talks about Dominicans and chicken
4 wings.

5 A Yes.

6 Q Highly offensive?

7 A Of course it is.

8 Q Why was that not included in the
9 EEOC or the complaint?

10 MS. LILBURN: Objection.

11 MR. HANS: What's the objection?

12 MS. LILBURN: We cannot talk
13 about the EEOC and the complaint
14 together.

15 MR. HANS: I will take each one
16 separately.

17 Q Why was that fact not included in
18 the EEOC complaint?

19 MS. LILBURN: Objection. You
20 already covered this.

21 MR. HANS: No. The statement of
22 the Dominicans and chicken wings.

23 A There were many statements.

24 Q Your response to the defendants'
25 interrogatories --

1 A.B. Nelson

2 MR. HANS: Can we go off the
3 record for a second.

4 (A discussion was held off the
5 record.)

6 MR. HANS: Right now I am not
7 talking about wire fraud. I'm talking
8 about the interrogatories.

9 Q Mr. Nelson, you talked about Alex
10 Lettas making some really horrible statements
11 about Dominicans and chicken wings and that
12 was not included in the EEOC complaint or your
13 complaint in this action.

14 A It would not be included because
15 a broader statement was made in the EEOC
16 complaint or the court complaint. You
17 expanded by asking questions what certain
18 things and that's how you got those answers.

19 Q Sir, this is not my lawsuit.
20 Please understand. It is not about what I do.
21 You have the choice of putting down the words
22 in the EEOC complaint and you have the choice
23 of putting down words in the complaint. My
24 client must respond. What I'm asking is, when
25 you amplified during discovery, you amplified

1 A.B. Nelson

2 your complaint by talking about what Alex
3 Lettas said about Dominicans, correct?

4 A Yes, I did.

5 Q I ask you if you thought this was
6 really horrible, wrongful words, and you very
7 strongly agreed that they were.

8 A Yes, they were.

9 Q This is not a trick question. I
10 am just asking why wasn't this something so
11 substantial included in either the EEOC or the
12 lawsuit complaint?

13 A Because they just want, you
14 know -- they don't want a telephone book of
15 information. They just want that there were
16 insults and racial and then you -- what
17 happens is we expand on that when we did the
18 interrogatories, but usually in a complaint --
19 you are not putting every absolute thing that
20 happened because all of it is bad.

21 Q Wouldn't you think the
22 substantial ones should be included?

23 MS. LILBURN: Objection.

24 A It's substantial. They are all
25 substantial.

1 A.B. Nelson

2 Q If it is substantial, don't you
3 think it should be there?

4 MS. LILBURN: Objection.

5 MR. HANS: What's the objection?

6 MS. LILBURN: You're asking him
7 about the sufficiency of his complaint.

8 MR. HANS: I did not ask about
9 sufficiency.

10 MS. LILBURN: If it is
11 substantial, don't you think it should
12 be in there. He is not a lawyer.

13 MR. HANS: He can answer the
14 question.

15 Q Do you think that is a
16 substantial fact that should have been
17 included in your complaint?

18 A There's a lot of substantial
19 facts. I could not fit all of them in the
20 complaint. There's a plethora of substantial
21 facts.

22 Q Dr. Dictor is your doctor, right,
23 that you gave us the name of?

24 A He is my physician, yes.

25 Q Did you see him regarding the

1 A.B. Nelson

2 complaints in this action?

3 A Regarding the complaints?

4 Q Did you go see Dr. Dictor
5 regarding any of the complaints or conduct
6 that you complain about in this case?

7 A No. He's a regular doctor. He's
8 my regular doctor.

9 Q Did you discuss with him any of
10 the complaints or things you say you suffered
11 from at the job?

12 A No. I never actually
13 discussed -- I might have said to him I'm
14 having a rough time at my job, but we did not
15 go into a discussion like he was a
16 psychiatrist or something. He's just my
17 regular doctor for like twenty years.

18 Q Did you tell him anything about
19 what you were going through?

20 A I am sure I did. I'm sure I
21 might have told him my blood pressure is a
22 little high and I'm very aggravated at work.
23 That might have been -- I'm sure it came up in
24 conversation, but it was not something that
25 was tabulated and put into my records or

1 A.B. Nelson

2 anything as if I was speaking to somebody
3 along the line of psychiatry or something.

4 Q Have you seen a doctor for any of
5 the complaints of any pain, suffering,
6 humiliation that you complain about in this
7 case? Have you seen a doctor for any of that?

8 A No. I have not seen a
9 psychiatrist for any of that.

10 Q How about a medical doctor?

11 A I would go to a medical doctor
12 for medical problems.

13 Q Are you seeing a medical doctor
14 regarding the complaints that you made in this
15 case?

16 A No.

17 Q Do you believe that your
18 allegation in the complaint, that Victory was
19 scamming you and other salespersons out of
20 commission rewards money --

21 A Do I believe it?

22 Q Do you believe that was based on
23 any discriminatory reasons, racial
24 discriminatory reasons?

25 A I believe it was based on greed.

1 A.B. Nelson

2 It doesn't matter because everybody is the
3 same working there. We had a few white
4 salesmen there and I'm sure they got -- of
5 course they didn't stay.

6 MR. HANS: Can I have a moment.

7 (A discussion was held off the
8 record.)

9 Q Mr. Nelson, when your employment
10 came to an end in August of 2018, did you end
11 it voluntarily or did the employer tell you to
12 leave?

13 A No, constructive discharge -- is
14 that the word.

15 Q You left because you could not
16 handle it?

17 A I was fed up.

18 Q Did you receive a text from Mr.
19 Orsaris as to where are you and what's going
20 on?

21 A I think I sent that to you.

22 MS. LILBURN: Yes or no.

23 A Yes.

24 Q Is it your testimony that you
25 sent me the text where Mr. Orsaris asked you

1 A.B. Nelson

2 about that?

3 A I think that might have been
4 included.

5 Q It was not.

6 A Yes, he did.

7 Q Were you aware or did Mr. Orsaris
8 make you aware of the garnishment that was
9 about to happen on your wages the week before
10 you departed your employment?

11 A I was already aware of that.

12 Q Were you aware of that before
13 August 2018?

14 A Before, I believe I was. I was
15 alerted about that.

16 Q When were you alerted?

17 A I don't remember, but I was aware
18 of it and I know it says in here that they're
19 trying to say that I am moving, trying to move
20 from place to place. I would never leave a
21 job.

22 Q I am not asking for a speech.
23 I'm asking you is the garnishment that was
24 about to happen a week after you left, was
25 that the reason you left?

1 A.B. Nelson

2 MS. LILBURN: Objection.

3 A No, it was not.

4 MR. HANS: What's the objection?

5 MS. LILBURN: I do not know how

6 this garnishment has been established.

7 MR. HANS: We do not know either.

8 Q There was a garnishment, correct?

9 A Yes, and I was not leaving my job
10 because of a garnishment.

11 Q Are there any other documents
12 besides the document that your attorney handed
13 me and the Yelp document that you have that
14 you want to submit in this case?

15 A Subtract those two and the rest
16 of the stuff that I'm supposed to submit to
17 you by Wednesday.

18 Q The rest of the stuff has to do
19 with witnesses, I believe.

20 A Yes.

21 MS. ORTIZ: The witnesses and the
22 phone.

23 MR. HANS: The phone I believe
24 we're going to go to the judge.

25 Off the record.

1 A.B. Nelson

2 (A discussion was held off the
3 record.)

4 I have nothing further.

5 (Whereupon, at 4:39 p.m., a
6 recess was taken.)

7 (Whereupon, at 4:56 p.m., the
8 examination resumed.)

9 EXAMINATION BY MR. KATES:

10 Q Good afternoon, Mr. Nelson.

11 A Good afternoon, Mr. Kates.

12 Q My name is Andrew Kates, as you
13 know, and my office represents Mitsubishi
14 Motors North America in this case. I have
15 some quick basic questions and I will do it as
16 fast as I can here.

17 Have you ever been known by any
18 other names besides Anthony Nelson?

19 A My middle name is Barry.

20 Q Any other names besides Anthony
21 Barry Nelson?

22 A Do you mean like nicknames?

23 Q No, official names.

24 A No. My name has always -- legal
25 name has always been Anthony Nelson.

1 A.B. Nelson

2 Q Coming in today for your
3 deposition, did you review any documents other
4 than the documents that we have seen today?

5 A Do you mean today did I see any
6 documents before these?

7 Q In preparing for today's
8 deposition?

9 A Yes. The documents she just
10 retrieved for the Social Security number
11 messed up thing for the card. I believe -- I
12 looked at a few things while I was home, some
13 interrogatories and some different things.

14 Q Was that produced in this case?

15 A Yes. They were given to both of
16 them.

17 Q Have you ever served in the
18 military?

19 A No.

20 Q Have you ever been arrested
21 before?

22 A Arrested?

23 Q Yes.

24 A Yes.

25 Q When?

1 A.B. Nelson

2 A I think the 90's I was arrested
3 for driving too fast. They let me go.

4 Q Besides that, was there any other
5 time?

6 A No.

7 MS. LILBURN: Can we go off the
8 record.

9 (Whereupon, at 5:01 p.m., a
10 discussion was held out of the room
11 between Ms. Lilburn, Ms. Ortiz and the
12 witness.)

13 (Whereupon, at 5:03 p.m., the
14 examination resumed.)

15 MS. LILBURN: I just want to
16 clarify for the record. I spoke to Mr.
17 Nelson about one of his prior answers
18 and he would like to revisit the
19 question you had asked whether he had
20 ever served in the military. Can you
21 reask that question.

22 CONTINUED EXAMINATION BY MR. KATES:

23 Q Mr. Nelson, what is it about my
24 question with the military that you would like
25 to change in your answer. I believe you had

1 A.B. Nelson

2 said no.

3 A Actually, I was in the military
4 and then I got out of the military. I was in
5 there for less than a year. After my A
6 school, I got out.

7 Q What branch in the --

8 A In the Navy.

9 Q When did you go in?

10 A I believe it was mid 70's.

11 Q Honorable discharge?

12 A Dishonorable. I got out.

13 Q Tell me about the dishonorable
14 discharge?

15 A I wanted to get out, so, you
16 know, it was a dishonorable discharge. It
17 wasn't -- not that I broke any laws or
18 anything. I just wanted to get out.

19 MS. LILBURN: Before we go any
20 further, I just want to ask what the
21 relevance of this line of questioning
22 is?

23 MR. KATES: He came back to it.

24 MS. LILBURN: I know. I wanted
25 to clarify the record, the yes or no

1 A.B. Nelson

2 answer, but to the extent we are going
3 to discuss this further, I am just
4 wondering what the relevance is.

5 MR. KATES: I don't think I have
6 to tell you the relevance.

7 A It's forty-five years ago. I
8 cannot remember the relevance. It's forty-
9 five years ago.

10 Q I just want to know what
11 happened, why did you leave?

12 A I needed to leave. I needed to
13 come back to New York.

14 Q Why did you have to come back to
15 New York?

16 A I had to come back.

17 Q Mr. Nelson, earlier you testified
18 that you had two prior Title 7 cases against
19 two former employers; do you recall that
20 testimony?

21 A Yes, I do.

22 Q The first case was against
23 Telecommunication --

24 A The first one was Beachwood and
25 then the latter one -- there was one in

1 A.B. Nelson

2 2000 -- 1999 or 2000, and the other one was in
3 2009, I believe, or something like that.

4 Q You said Beachwood was the first
5 one?

6 A Yes.

7 Q Both of those claims were based
8 on Title 7?

9 A Yes.

10 Q Title 7 under what grounds?

11 A Not age discrimination, but
12 racial discrimination.

13 Q So it was racial discrimination
14 in both claims?

15 A In both claims, yes, no age
16 discrimination, just racial.

17 Q Was there a trial in either one
18 of those cases?

19 A No, there wasn't.

20 Q Were you represented by counsel
21 in those cases?

22 A No, I was not.

23 Q Did you ever receive an employee
24 handbook when you started at Victory?

25 A No. I never saw an employee

1 A.B. Nelson

2 handbook until just before I left. I never
3 received one. The one that I found which says
4 Spartan and everything on it, I was excluded
5 from that, so I was never issued one. I was
6 never sat down when they put these new terms
7 together. I was just shoveled off as far as
8 that goes and I asked about it three or four
9 times.

10 Q You said Spartan, correct?

11 A Yes.

12 Q What were you excluded from?

13 A When they sat down with people
14 and they gave these handbooks out, which
15 included stuff about vacation, pay, time and
16 rules and regulations and stuff that all
17 companies should have, they never had it until
18 the incident happened with me and that's when
19 they decided to do it.

20 Q When you were at Victory, did you
21 get any vacation time?

22 A No, never was. There was
23 nothing -- the book that I did not get, this
24 handbook -- it wasn't even a handbook. It was
25 some papers stapled together. I never got it

1 A.B. Nelson

2 or received it or anything about vacation or
3 anything of that nature.

4 Q If you needed to take a day off
5 and you were at Victory, who would you go to?

6 A If I needed to take a day off, I
7 would either go to Shane or I would go to
8 Stavros or, you know, I would go to one of my,
9 you know -- if I had to take a day off or I
10 had to take some time off, which I never ever
11 took any time off.

12 Q Would you reach out to somebody
13 at Mitsubishi for a day off?

14 A Would I reach to somebody at
15 Mitsubishi?

16 Q Mitsubishi Motors North America?

17 A Would I reach out to somebody at
18 Mitsubishi North America?

19 Q If you needed to take a day off?

20 A No. I would reach out to them
21 about taking a day off to go to Mitsubishi
22 training or something of that nature. If I
23 wanted a day off, I would speak to one of my
24 supervisors.

25 Q If you needed to go to a doctor,

1 A.B. Nelson

2 you weren't feeling well, you needed to leave
3 early, for those types of days or reasons to
4 miss work, would you go to Mitsubishi?

5 A No, I wouldn't.

6 Q When you would get to Victory,
7 let us say in the morning, what is the first
8 thing that you would do?

9 A When I get to Victory the first
10 thing in the morning?

11 Q Do you punch in? Do you have a
12 timecard?

13 A No. We don't use timecards in
14 that store, or at least when I was there there
15 were no timecards. The last store I worked in
16 had that, but they didn't have that there.

17 Q Walk me through it. You would
18 get there in the morning. Tell me what a
19 typical morning is like when you would walk
20 in?

21 A A typical morning, I would
22 usually get there a few minutes ahead of time.
23 I would put my bag, you know, come to my desk.
24 I would go next door to Cozy Cottage and get
25 myself some coffee or a sandwich and come back

1 A.B. Nelson

2 in and, you know, I would start waiting for
3 ups. An up means a customer. I would be
4 waiting for customers to arrive at the store
5 so you can grab yourself an up and basically
6 once we were doing Mitsubishi, we were trying
7 to push, of course, the Mitsubishi products.

8 Q You said once you started doing
9 Mitsubishi. What does that mean?

10 A Well, the store was not a
11 Mitsubishi store all along. They had other
12 locations that was a Mitsubishi store.

13 Q When you started at Victory, was
14 it a Mitsubishi store?

15 A No.

16 Q What was it?

17 A It was not Bronx Suzuki anymore,
18 even though a lot of the paperwork does say
19 Bronx Suzuki. Basically it was like a
20 boutique store. There was just a lot of
21 high-end, pre-owned vehicles, you know, and
22 regular stuff, you know, like Camrys and
23 things like that, Mercedes, Jaguar, you know,
24 pre-owned stuff.

25 Q A potential buyer walks in. You

1 A.B. Nelson

2 show him a vehicle. He asks for a quote. Who
3 do you go to for a quote on a vehicle?

4 A When the buyer comes in, we do a
5 walk-around on the car. You're talking about
6 a Mitsubishi or just any car, in general?

7 Q Did you sell any other new cars
8 besides Mitsubishi?

9 A We sold pre-owned vehicles, other
10 brands, which could be anything, Dodge
11 Chargers, super sport cars, Camaro, regular
12 Camaro.

13 Q On a Mitsubishi vehicle, on a new
14 Mitsubishi vehicle, if the buyer asks for a
15 quote, who do you go to for that quote?

16 A Do you mean the price?

17 Q Yes.

18 A We have the window sticker on the
19 car, so basically when we do the walk-around,
20 after the interview with the customer to see
21 the have nots and what they would probably
22 like on their new vehicle which they did not
23 have on their other one, so forth and so on,
24 you do a walk-around, and then let us say it
25 is the top of the line Toyota Outlander and

1 A.B. Nelson

2 it's the big one and it has all the options,
3 so that's 30 something thousand dollars.

4 Basically what you're doing is you're making
5 that \$30,000 car look like a \$40,000 car
6 because it does have a lot of luxury options.

7 Q So you gave them the sticker
8 price and the customer says I don't think so.
9 He begins to walk out and you say hold on a
10 second, let me see what I can do, right?

11 A Yes.

12 Q Who do you go to if you need
13 authority to offer a lower price on that car?

14 A At that point when a customer is
15 having those types of thoughts, we call in a
16 second pencil or a person to come in,
17 another -- we call in a second person like a
18 manager, a floor manager, his son, to come in
19 and sit down to help negotiate to keep the
20 deal negotiated.

21 Q So somebody else from Victory
22 comes over?

23 A Yes.

24 Q So you would go to somebody from
25 Victory to get the authority to offer a lower

1 A.B. Nelson

2 price?

3 A Of course, yes.

4 Q You said before that you would
5 not go to Mitsubishi, itself, Mitsubishi
6 Motors North America, that is, for authority
7 to offer a lower price; is that correct?

8 A No store would go to any
9 manufacturer to do that.

10 Q Let us talk about your work
11 schedule. Who would set your work schedule?

12 A The managers. They put the
13 schedule together. Most of us work six days a
14 week and every other week we have two days
15 off. I believe every other Sunday we have off
16 and we have one day off all the time during
17 the week, and the Sundays would alternate.

18 MR. KATES: Can I have this
19 marked, please.

20 (Whereupon, at this time, the
21 reporter marked the above-mentioned
22 document as Defendants' Exhibit N for
23 identification.)

24 Q Mr. Nelson, you have what was
25 marked as Exhibit N in front of you. Have you

1 A.B. Nelson

2 seen this document before?

3 A Sure.

4 Q Can you describe to me what it
5 is?

6 A This particular document here is
7 the breakdown of the two properties, one is
8 4101 Boston Road and across the street,
9 alongside or adjacent to the Sunoco station,
10 is 4070, so those are the two showrooms.

11 Q 4101 is Victory?

12 A They're both Victory.

13 Q They're both Victory?

14 A Right. The way real estate is, I
15 guess in the Bronx over there, it's not like
16 you're sprawling where you have a nice big
17 building and so they're set up in two places.

18 Q They are both Mitsubishi, Victory
19 Mitsubishi?

20 A Yes.

21 Q Can you turn to the second page
22 for me.

23 A The second page. Yes, sir.

24 Q Do you see what looks like a
25 schedule?

1 A.B. Nelson

2 A Yes.

3 Q Is that your name with your phone
4 number on the top left-hand side of that
5 schedule?

6 A That's right, numero uno, right
7 on top.

8 Q You have working days Monday,
9 Tuesday, Wednesday, Thursday, off Friday, on
10 Saturday, and it looks like you are an
11 alternate on Sunday; is that correct?

12 A Right, every other Sunday.

13 Q Who made the schedule?

14 A This schedule was made by our
15 managers. Which manager, I don't recall. It
16 could have been Stavros or it could have been
17 Shane. I don't remember. As a matter of
18 fact, there are numerous schedules, as you can
19 see, that go as far back as probably 2016.

20 Q You had said one of the managers.
21 Do you mean a Victory manager?

22 A Yes.

23 Q Is this schedule released every
24 week for Victory?

25 A No. No. These are long-lasting

1 A.B. Nelson

2 schedules. If it changed, it was because a
3 person left, dropped down and another person
4 came in, so if you see these names, the stuff
5 changed, it's because of that.

6 Q If you were to request a schedule
7 change, who would you go to for that change?

8 A If I wanted to let's say change
9 one of my days off or something?

10 Q Yes. Let us say you wanted a
11 Wednesday off instead of a Friday, who would
12 you go to?

13 A I would go to one of the floor
14 managers for that.

15 Q The floor manager from Victory?

16 A Yes.

17 Q Would you go to anybody from
18 Mitsubishi Motors North America to change your
19 schedule?

20 A To change my schedule?

21 Q Correct.

22 A No.

23 Q Did Mitsubishi have any input in
24 the making of your schedule, and when I say
25 Mitsubishi, I mean Mitsubishi Motors North

1 A.B. Nelson

2 America?

3 A No. They are in Cypress,
4 California.

5 Q Did they have any input in making
6 your schedule?

7 A No.

8 Q Turn to the next page for me.
9 This is another schedule. If I ask you the
10 same questions about this schedule I just
11 asked you about the schedule on Page 2 of this
12 exhibit, would your answers be the same?

13 A They would be the same for every
14 schedule that's in your hand.

15 Q You can put that aside. Thank
16 you.

17 Earlier you testified that you
18 had a desk assignment. You were in front of,
19 I believe, Mr. Wood, correct?

20 A A desk assignment, what do you
21 mean? The desk that I had, yes. He sat
22 behind me. He was in the desk right behind
23 me.

24 Q Who assigned you to that desk?

25 A Who assigned me to that desk?

1 A.B. Nelson

2 Q Yes.

3 A It wasn't Mitsubishi North
4 America.

5 Q Was it somebody from Victory?

6 A Sure.

7 Q What kind of break schedule did
8 you have when you were with Victory?

9 A Do you mean what breaks I would
10 take?

11 Q Yes. Would it be a fifteen-
12 minute break, thirty-minute break?

13 A Lunch break, whatever you're
14 asking?

15 Q What was your break schedule
16 like?

17 A I really don't take breaks. I go
18 get my food and I eat. A lot of times I would
19 even eat at my desk. I don't really take
20 breaks.

21 Q If you did take a break, would
22 you notify somebody?

23 A Sure.

24 Q Who would you tell?

25 A Whoever the floor manager was.

1 A.B. Nelson

2 Q A floor manager from Victory?

3 A Yes.

4 Q Not anybody at Mitsubishi?

5 A No, only if I was at the
6 Mitsubishi school and I needed to take a break
7 while I was in training, so then I would.

8 Q The training, is it a product
9 familiarization course?

10 A Yes, product training, yes.

11 Q Who supervised your day-to-day
12 responsibilities at Victory?

13 A Different managers. Like I said,
14 we went through quite a few managers and, of
15 course, Stavros and Peter have always been
16 there, but Shane was there, Shane Bacus, but
17 it was a multitude of managers.

18 Q These managers, were they Victory
19 managers?

20 A Were they what now?

21 Q Were they Victory managers?

22 A They were Victory Mitsubishi
23 managers once we became Mitsubishi, but they
24 are managers of that store.

25 Q When it became Victory

1 A.B. Nelson

2 Mitsubishi, they were managers for Victory
3 Mitsubishi?

4 A Exactly.

5 Q The inventory lots that you spoke
6 about earlier, you said there were four of
7 them, correct?

8 A There was a time when they had
9 four lots. It changed.

10 Q The cars that are in that lot, to
11 the best of your knowledge, who owned those
12 vehicles?

13 A Who owns those vehicles?

14 Q Yes.

15 A The bank owns them.

16 Q Does Mitsubishi North America own
17 them?

18 A Owns those cars, right.

19 Q Mitsubishi Motors owns those
20 vehicles?

21 A They are given those cars to be
22 sold. What about that?

23 Q I am just asking what you know on
24 that. Do you know who the owner of those
25 vehicles are?

1 A.B. Nelson

2 A The owners of those vehicles?

3 Q Yes.

4 A I don't do the paperwork on that,
5 so I don't know exactly how that works. I'm
6 sure Mitsubishi North America owns it and they
7 bring them there and then the bank finances
8 those vehicles.

9 Q What is your basis of your belief
10 that Mitsubishi owns those vehicles? Do you
11 have any documents that support that?

12 A No. I don't have any documents
13 that support that.

14 Q If I told you that Mitsubishi
15 Motors North America did not own those
16 vehicles, would you have any reason to contest
17 that statement?

18 A No. I wouldn't contest it
19 because usually those vehicles that come
20 there, they become the ownership either
21 through banks or whatever of that dealer.

22 Q The building at 4101, do you know
23 who owns that building?

24 A I know who owns half the
25 property. That's a friend of mine, the

1 A.B. Nelson

2 property in the back. I believe the
3 building -- Mitsubishi doesn't own it, if
4 that's what you're asking.

5 MS. LILBURN: Do you know who
6 owns it?

7 A I can't think of his name right
8 now.

9 Q Does Mitsubishi Motors North
10 America own that building?

11 A No, they do not.

12 Q When you were at Victory, did you
13 receive any form of health benefits?

14 A No.

15 Q Did you receive a salary or was
16 it strictly commission?

17 A We got a salary, a draw, and the
18 commissions and we were remunerated also by
19 Mitsubishi North America.

20 Q How so?

21 A Every time we sell a car with
22 their Diamond -- their stair-step program.

23 Q So you would get money from
24 Mitsubishi Motors North America every time you
25 would sell a car?

1 A.B. Nelson

2 A Every time you sell a car.

3 Q Every time you sell a car?

4 A Every time you sell a Mitsubishi
5 car.

6 Q Every time you sell a new
7 Mitsubishi car, you would get paid from
8 Mitsubishi Motors North America?

9 A Also, yes.

10 Q When you say also, do you mean
11 you would get paid from Victory and then you
12 would get paid from Mitsubishi Motors North
13 America?

14 A Yes.

15 Q When you say you get paid from
16 Mitsubishi Motors North America, is that
17 represented in the 1099's that you submitted
18 in opposition to the motion to dismiss?

19 A Right.

20 Q I believe there was approximately
21 \$3,000 for the year 2017 and \$1500 for the
22 year 2018?

23 A Sure.

24 Q You are saying it is the Diamond
25 Program, right? It's Diamond Rewards?

1 A.B. Nelson

2 A That's what it is labeled as,
3 yes.

4 Q Would you classify that as a
5 rewards program?

6 A That is what your client has it
7 as, but I never classified it as anything,
8 except whatever it is.

9 Q If you sold a car, Mitsubishi
10 recognized that?

11 A Yes.

12 Q Then you would receive a reward
13 for that, correct?

14 A Well, some places it's rewards
15 and some places, if it is a General Motors
16 vehicle, it can be a holdback.

17 Q So why is it that you only
18 received approximately \$5,000 in total from
19 Mitsubishi Motors North America over two years
20 if you got paid from Mitsubishi Motors North
21 America every time you sold a car?

22 A Because we did not sell that many
23 Mitsubishis. The other thing is, the
24 Mitsubishis that were sold, they wanted me to
25 do the Diamond deliveries on other people's

1 A.B. Nelson

2 vehicles, so that kept me -- that distracted
3 me from being able to sell to customers
4 because they used me to bring their CSI, their
5 score up for the store, which had tanked.

6 Q Did you receive a salary from
7 Mitsubishi Motors North America?

8 A I received a partial salary from
9 them which they have labeled as rewards or
10 whatever the case may be. It's just like I
11 don't really receive a salary, but you receive
12 commission on selling vehicles. I don't know
13 if you would call commission a salary, but I
14 receive a percent, something for every time a
15 Mitsubishi car that I sell.

16 Q You receive a weekly draw from
17 Victory, correct?

18 A It's a weekly draw.

19 Q Do you have a weekly draw from
20 Mitsubishi North America?

21 A Not every dealership does that.

22 Q Do you have a weekly draw from
23 Mitsubishi Motors North America?

24 A No, but I do have, every time I
25 sell a Mitsubishi product, we get remunerated

1 A.B. Nelson

2 for it.

3 Q Did you ever receive performance
4 reviews while at Victory?

5 A What do you mean?

6 Q An annual review?

7 A No.

8 Q Did you ever receive any type of
9 performance reviews from Mitsubishi Motors
10 North America?

11 A I don't think so. I don't
12 believe so.

13 Q Earlier you testified about being
14 pulled from the sales floor?

15 A Yes.

16 Q Who pulled you from the sales
17 floor?

18 A Chris pulled me from the sales
19 floor.

20 Q Chris who?

21 A Chris Orsaris, right here.

22 Q He was with Victory.

23 A Yes.

24 Q Did anybody from Mitsubishi
25 Motors North America pull you from the sales

1 A.B. Nelson

2 floor?

3 A No.

4 Q You said you did not sell too
5 many new Mitsubishis. What did you sell?

6 A Other cars, other brands.

7 Q Non-Mitsubishi?

8 A Right, pre-owned cars.

9 Q What role would Mitsubishi Motors
10 North America play when you sold a Hyundai?

11 MS. LILBURN: Objection.

12 A They're coming into a Mitsubishi
13 store or if they come into a Chevrolet store,
14 you know, they're coming into a store. It's
15 under your umbrella, your name, to buy a
16 vehicle, whether it turned out to be a
17 Mitsubishi or a Jaguar. They're coming in --
18 your name is plastered.

19 Q When you say your name, what name
20 is that?

21 A Mitsubishi.

22 Q There was nothing in front or
23 behind Mitsubishi, just Mitsubishi?

24 A It says Victory Mitsubishi, but
25 it's still Mitsubishi.

1 A.B. Nelson

2 Q If I tell you that it is Spartan
3 Auto Group doing business as Victory
4 Mitsubishi and it is not Mitsubishi Motors
5 North America, do you have any reason to
6 contest that statement?

7 A But they're doing business with
8 them.

9 Q I'm asking you a question.

10 A What was the question?

11 Q Is it Spartan Auto Group doing
12 business as Victory Mitsubishi?

13 MS. LILBURN: Objection. Are you
14 doing business as formally, the
15 corporate name? I think he may be
16 confused by the doing business as.

17 A DBA, doing business as. What is
18 your question?

19 MR. KATES: Can I have the
20 question read back, please.

21 (Whereupon, at this time, the
22 requested question was read by the
23 reporter.)

24 Q You said Mitsubishi was plastered
25 all over the place, correct?

1 A.B. Nelson

2 A Exactly.

3 Q Do you have any reason to contest
4 that Victory Mitsubishi is not Mitsubishi
5 Motors North America?

6 A It's an affiliate.

7 Q What was the purpose of the
8 training modules?

9 A Which training modules?

10 MR. KATES: Withdrawn.

11 Can I have this marked as Exhibit
12 O, please.

13 (Whereupon, at this time, the
14 reporter marked the above-mentioned
15 document as Defendants' Exhibit O for
16 identification.)

17 Q We talked earlier about product
18 familiarization and the training associated
19 with that. You had received what you are
20 looking at now, a certificate of completion,
21 correct?

22 A We would have to go on to the
23 intranet site and take tests because
24 Mitsubishi or any manufacturer wants to put
25 the provisions in place as to how to deliver.

1 A.B. Nelson

2 They want to control how the product is sold.
3 They want to control how the product is sold,
4 and they do that -- they do that by monitoring
5 everything we do through the intranet site,
6 certifying us, giving us -- if we sell the
7 vehicle the way Mitsubishi is telling us to
8 sell it --

9 Q It just talks about control; is
10 that correct?

11 A Yes.

12 MR. KATES: Can I have this
13 marked as Exhibit P, please.

14 (Whereupon, at this time, the
15 reporter marked the above-mentioned
16 document as Defendants' Exhibit P for
17 identification.)

18 Q Mr. Nelson, you have two pages in
19 front of you. It has been marked as
20 Defendants' Exhibit P. This is a tip sheet,
21 as it says on the top, correct?

22 A Yes.

23 Q You just said that Mitsubishi
24 wants to control the delivery process,
25 correct?

1 A.B. Nelson

2 A Yes.

3 Q At the top it says tip sheet,
4 correct?

5 A Yes.

6 Q If you look under the four
7 pictures that you see there, it says here are
8 some tips to and one, guide you through the
9 delivery process, gain repeat and referral
10 business, increase your SSI score.

11 A Yes.

12 Q Do you think a tip is a mandate?

13 A Is it a mandate?

14 Q Yes.

15 A Can you expand on that question?

16 Q Is it a requirement?

17 A It's written here as a tip, but
18 all of these things are requirements to sell
19 the vehicle.

20 Q Do you have any documentation to
21 support this requirement?

22 A I don't have any documentation
23 with me.

24 MS. LILBURN: Not right now.

25 Q But you do have documentation to

1 A.B. Nelson

2 support that?

3 A Support what?

4 Q That it is a requirement and not
5 a recommendation or a guide?

6 A Documentation that would support
7 this is in the training, so in the training
8 these things that you see here, when we take
9 the test, when we do the training, these
10 things are mandated because we are supposed to
11 follow them.

12 Q So you are saying it is a mandate
13 even though it says tip sheet here?

14 A This says tip sheet. It says tip
15 sheet, but the delivery process has been
16 online and it is not called a tip sheet. This
17 is just something that they put together. It
18 says tip sheet and it says delivery process,
19 but when you are trained, this is before you
20 even get this, when you are trained at
21 Mitsubishi school through the intranet, you
22 can also call them up and talk to them,
23 whatever the case may be, and these things are
24 already put in place and you're supposed to
25 follow those guidelines when delivering a

1 A.B. Nelson

2 Mitsubishi product.

3 Q You just said they are
4 guidelines.

5 A Right, it's guidelines.

6 Q Are the guidelines a requirement?

7 A It's required to perform the
8 proper delivery in a Mitsubishi Triple Diamond
9 standard, so whatever provisions that they put
10 out there for us, we're supposed to follow
11 those guidelines and not do whatever we want,
12 whatever the case may be, but, of course, not
13 everybody follows the rules.

14 Q If you did not follow the rules
15 and it required somebody to be reprimanded,
16 who would carry out that reprimand? Would
17 anybody from Mitsubishi Motors North America
18 carry out that reprimand?

19 A I think if Mitsubishi Motors
20 North America was alerted to how we're doing
21 the business at that time, they would probably
22 be reprimanded, because a lot of this stuff
23 that's in the provisions, the books, is not --
24 the store is not in compliance with dozens of
25 stuff in their contract.

1 A.B. Nelson

2 MR. KATES: Move to strike the
3 portions nonresponsive.

4 Q If there was a reprimand to be
5 carried out, if someone did not follow this
6 tip sheet, who would carry out the reprimand?
7 My question is, would Mitsubishi Motors North
8 America carry out that reprimand if someone
9 did not follow this tip sheet?

10 A The tip sheet?

11 Q Yes.

12 A Or do you mean in general follow
13 everything that we have been trained and told
14 how to do?

15 Q Let us start in general, first.
16 Generally speaking, if someone did not follow
17 one of those guidelines or tips, would
18 Mitsubishi Motors North America carry out a
19 reprimand on them?

20 A I think if they knew something,
21 some of the things, I'm pretty sure that they
22 would.

23 Q I'm asking you have you seen them
24 do it?

25 A I don't know if they were alerted

1 A.B. Nelson

2 to it.

3 Q My question is have you seen
4 Mitsubishi Motors North America carry out a
5 reprimand for someone at Victory Mitsubishi?

6 A They're not aware of it, so
7 obviously, because they're not aware of it,
8 then nobody's going to see it, but they can be
9 made aware of it, and then who knows what
10 would happen after that.

11 MR. KATES: Move to strike the
12 portions that are not responsive.

13 Q Have you ever been to Mitsubishi
14 Motors North America headquarters?

15 A I've never been there, but I have
16 seen it, the one before they moved, when I
17 lived in Orange. My cousin lives in the next
18 town over. I've not been to the new one.

19 Q But you have been to the old one?

20 A I've not been inside the old one,
21 but I have seen it.

22 Q Have you ever walked inside the
23 new one?

24 A I have not walked inside.

25 Q There was an old Mitsubishi

1 A.B. Nelson

2 headquarters and a new Mitsubishi
3 headquarters. Have you ever stepped foot
4 inside the old Mitsubishi headquarters?

5 A No.

6 Q Have you ever stepped foot inside
7 the new Mitsubishi headquarters?

8 A No, I have not. I have not
9 opened the door to either one of those
10 buildings.

11 Q What was your purpose of the
12 visit then, being in the vicinity of the
13 building?

14 A Because I lived in Orange,
15 California, yes. I am from California.

16 Q So you were not there on a work
17 visit?

18 A No. No.

19 Q Did Mitsubishi Motors North
20 America have an employee at Victory Mitsubishi
21 on a daily basis?

22 A They have sometimes on a daily
23 basis, but not on a daily basis where they
24 have -- what would you call Kevin Burns. They
25 have people that come to Mitsubishi, not

1 A.B. Nelson

2 daily, but maybe once a week or sometimes
3 twice a week, depending on what's going on.

4 Q To do what?

5 A I guess to oversee what's going
6 on. That's what district managers do. They
7 go to all the different dealerships in that
8 area. They're assigned certain dealerships to
9 make sure that they are pulling the rope the
10 right way.

11 Q So you're saying once a week
12 there would be a Mitsubishi rep present at
13 Victory Mitsubishi?

14 A Sometimes once a week and
15 sometimes twice. There have been weeks when
16 there hasn't been anybody there.

17 Q Did you ever see a Mitsubishi rep
18 direct an employee, a Victory employee?

19 A I don't know. I have never seen
20 it.

21 Q Has a Mitsubishi rep ever
22 directed you to do a job task while at
23 Victory?

24 A What do you mean?

25 Q Did they issue you a job task?

1 A.B. Nelson

2 Did they ask you to do something?

3 A When we got the PHEV cars in.
4 Those are battery-operated cars. It's plug-in
5 electrical vehicles or whatever. That's the
6 acronym.

7 Q Has anyone from Mitsubishi Motors
8 North America, when present at Victory
9 Mitsubishi, ever directed you to complete a
10 job task; yes or no?

11 A Well, I asked a Mitsubishi to
12 locate a special car for me and they located
13 it. They wanted me to make that deal happen.

14 Q Who is they?

15 A That was Kevin Burns.

16 Q So you asked somebody at
17 Mitsubishi Motors North America something?

18 A Because he would come to the
19 store and the problem was that the customer
20 wanted a particular color and there were two
21 of them on the dock in Baltimore.

22 Q My question is, did you ever
23 receive an order?

24 A Not an order, no.

25 Q That was my question. That's

1 A.B. Nelson

2 all.

3 A But a request.

4 Q What did they request of you?

5 A To sell their car, make it
6 happen.

7 Q Did you consider it a direct
8 order from your employer?

9 A A direct order?

10 Q Yes.

11 A Possibly.

12 Q Why do you say possibly?

13 A Well, after he did the work, I
14 think he wanted to make sure I tried to sell
15 that car, so he was encouraging me to sell the
16 car. You can call it an order or whatever.

17 Q This was one time?

18 A That was one time and that was a
19 few months before I left, yes.

20 Q So you received one order or
21 request in the entire time you were at Victory
22 from Mitsubishi Motors North America's rep?

23 MS. LILBURN: Objection.

24 Q Is that correct?

25 A Yes.

1 A.B. Nelson

2 Q If someone from Mitsubishi Motors
3 North America told you to do something and
4 Chris Orsaris told you to do something and it
5 was the same task, but they both wanted it
6 done different ways, who would you follow?
7 Would you follow the order from Chris or would
8 you follow the order from the Mitsubishi
9 Motors North America rep?

10 A Unfortunately, I've been
11 following the orders that are pretty much --

12 Q I'm asking a hypothetical. What
13 would you do?

14 A What would I do? I'd probably
15 have to follow his orders.

16 Q When you say his, do you mean
17 Chris?

18 A Yes. We're talking about Chris.

19 Q You would follow the orders from
20 Chris Orsaris at Victory?

21 A Yes.

22 Q Earlier you had testified that
23 after Victory you went to Toyota. What was
24 the name of that dealership?

25 A Citywide.

1 A.B. Nelson

2 Q You were there for approximately
3 six months?

4 A Yes.

5 Q You said you left Citywide
6 involuntarily?

7 A Yes.

8 Q Do you have any plans to sue
9 them?

10 A No.

11 Q When you were at Citywide, did
12 you go through any product familiarization
13 training?

14 A Yes. I am certified in Toyota.

15 Q When you were at Toyota, Citywide
16 Toyota, did you consider Toyota, itself, your
17 employer?

18 A Sure. Yes.

19 Q When you left Victory in August
20 of 2018, did you receive an exit interview?

21 A An exit interview?

22 Q Yes.

23 A Obviously not because people were
24 calling me.

25 Q Did Mitsubishi Motors North

1 A.B. Nelson

2 America have the power to terminate your
3 employment?

4 A Can they terminate a person's
5 employment?

6 Q Did they have the authority to
7 terminate?

8 A I can't answer that question. I
9 really don't know.

10 Q If I told you that they do not,
11 would you have any reason to contest that
12 statement?

13 A At the moment, I cannot think of
14 something that would make that happen, unless
15 I went berserk at Mitsubishi school or
16 someplace or something. I don't know. I
17 don't know. There could be a reason why the
18 umbrella company could fire somebody, but I
19 don't know what it could be.

20 MR. KATES: Move to strike the
21 portion that is not responsive.

22 MS. LILBURN: I think he answered
23 I don't know.

24 A I'm not sure. I don't know.

25 Q Has anybody ever told you that

1 A.B. Nelson

2 somebody at Mitsubishi Motors North America
3 has the authority to terminate your employment
4 at Victory Mitsubishi?

5 A No.

6 Q Have you ever seen somebody from
7 Mitsubishi Motors North America terminate
8 someone employed by Victory Mitsubishi?

9 A No.

10 Q How did you hear about the job at
11 Victory?

12 A How did I hear about the job at
13 Victory?

14 Q Yes.

15 A I know people that work there and
16 pretty much the whole area is my area, so I
17 know about things that go on there.

18 Q Walk me through the process. Did
19 you submit a resume? Did you call them? Tell
20 me what happened?

21 A I stopped by because I had people
22 that I knew that were there. I spoke to the
23 young lady at the desk who I'm familiar with.
24 Also my so-called niece worked upstairs for
25 eight years and so at the time I said -- I

1 A.B. Nelson

2 just went there and I filled out the
3 application.

4 Q Did you submit a resume?

5 A Yes, I did.

6 Q When you filled out the
7 application, who was that application being
8 submitted to? Was it being submitted to
9 Victory Mitsubishi or was it being submitted
10 to Mitsubishi Motors North America?

11 A It was not a Mitsubishi store at
12 that time. In 2015 that was not a Mitsubishi
13 store. We're talking November 2015 and so
14 that was not a Mitsubishi store.

15 Q It was Suzuki?

16 A It was a Suzuki -- Suzuki is out
17 of business, but a lot of the paperwork was on
18 Suzuki.

19 Q Who hired you?

20 A That's a good question. I'm
21 trying to remember that.

22 MS. LILBURN: You're asking for
23 an individual's name?

24 MR. KATES: Yes.

25 A It might have been Gene at that

1 A.B. Nelson

2 time. He was in charge at that time, so it
3 might have been Gene.

4 Q So it changed its name from
5 whatever it was to Victory Mitsubishi?

6 A Yes.

7 Q Walk me through the process of
8 you hearing that the name was changed? What
9 goes on with the name change?

10 A I actually sort of did work with
11 salesmen in both stores. The Larchmont store,
12 as I mentioned previously, the CSI score is
13 down. The higher the score is, the more money
14 you get, so if a store has a high score --

15 Q I am asking you what happened
16 when it changed names?

17 A It's a little difficult.

18 MS. LILBURN: Can you be more
19 specific when you say what happened.

20 Q At what point did they change
21 names to Victory Mitsubishi? At what point in
22 time, if you can give me a month and a year,
23 approximately?

24 A I don't know, but before it even
25 became that, we were selling Mitsubishi out of

1 A.B. Nelson

2 that location.

3 Q When it changed over to Victory
4 Mitsubishi, did you ever have to submit a job
5 application to Mitsubishi Motors North
6 America?

7 A No.

8 Q Earlier you gave us a list of
9 seven or eight managers at Victory; do you
10 recall that? You said Gene, Igor, Freddy 1,
11 Freddy 2, Shane Bacus, Peter I believe it was,
12 and Stavros was in there. Who were they
13 employed by?

14 A They're all Victory or Larchmont
15 Mitsubishi employees.

16 Q So they were employees of Victory
17 Mitsubishi or Larchmont Mitsubishi?

18 A Larchmont, yes, which is just up
19 north of New Rochelle and south of Mamaroneck.

20 Q You testified that Alex Lettas
21 wore many hats in the organization; is that
22 correct?

23 A Yes.

24 Q What organization is that?

25 A The organization we're talking

1 A.B. Nelson

2 about right now, Victory, Spartan, whatever.

3 Q What is the BDC department?

4 A Every dealership has a business
5 development center and that acronym stands for
6 business development center and every store
7 has one. They make phone calls. They have
8 lists of potential customers. Their job is to
9 bring them in.

10 Q Can you take a look at Exhibit B
11 that was marked earlier, B as in boy.

12 A Yes.

13 Q It says charge of discrimination
14 on top.

15 A Yes.

16 Q You list there under the name
17 Victory Mitsubishi; is that correct?

18 A Yes.

19 Q Why did you not list Mitsubishi
20 Motors North America on this document?

21 A It wasn't listed on this document
22 because I am a pro se litigant. I am not a
23 lawyer, so I didn't put that on this document,
24 but when the complaint on the court complaint,
25 it's on that one.

1 A.B. Nelson

2 Q Whose idea was it to put
3 Mitsubishi Motors North America on the court
4 complaint?

5 A Whose idea?

6 Q Yes.

7 A I put the caption together. I am
8 a pro se litigant.

9 Q What changed when you were a pro
10 se litigant back in June of 2018 and when you
11 were a pro se litigant when you filed the
12 complaint in Southern District, what changed
13 between the filing of the charge of
14 discrimination and the complaint?

15 A What changed?

16 Q Yes.

17 A Lots of times people do not put
18 parent companies or not parent companies, but
19 not -- they don't know to put it, so when the
20 immediate situation happened, before it
21 reached the court to get a right to sue letter
22 or to get the EEOC to look at what happened,
23 I -- it's not in there.

24 MS. LILBURN: Can I just remind
25 the witness not to reveal any privileged

1 A.B. Nelson

2 communications.

3 MR. KATES: Move to strike the
4 portions that are not responsive to the
5 question.

6 Q Mr. Nelson, if you look where it
7 says the particulars are, the paragraph that
8 looks like the statement of facts. It says
9 certified product specialist.

10 A Right.

11 Q Look at the sentence, third
12 sentence that begins in February of 2016.

13 A Yes.

14 Q In February 2016, Chris Orsaris
15 began his employment and Orsaris placed me in
16 a hostile work environment. Did anyone from
17 Mitsubishi Motors North America place you in a
18 hostile work environment?

19 A No.

20 Q The next sentence talks about,
21 the sixth line beginning with would.

22 A The manager would?

23 Q Would degrade and shame me in
24 front of customers.

25 A I see that.

1 A.B. Nelson

2 Q Did Mitsubishi Motors North
3 America have anything to do with that
4 activity?

5 MS. LILBURN: Objection.

6 A Only that we were selling
7 Mitsubishi products and that's about it.

8 Q Earlier you testified to wire
9 fraud and identity theft. Is the wire fraud
10 claim being made against Mitsubishi Motors
11 North America?

12 A Is it being made against
13 Mitsubishi Motors North America, sure, both
14 Victory and Mitsubishi.

15 Q The wire fraud and the identity
16 theft are also against Mitsubishi Motors North
17 America?

18 A Yes.

19 Q What is their involvement in the
20 wire fraud?

21 A Because there's a flaw in the
22 system.

23 Q What is the flaw in the system?

24 A The flaw is that people can
25 change people's ID numbers and freeze them out

1 A.B. Nelson

2 of the system. That includes the ID's and
3 Social Security number and whatever.

4 Q Earlier you testified about being
5 demoted. Do you recall that testimony?

6 A When I said I was taken off the
7 floor, yes.

8 Q Did anybody from Mitsubishi
9 Motors North America demote you?

10 MS. LILBURN: Objection.

11 A No.

12 Q Chris Orsaris had told you not to
13 go to Diane; is that correct?

14 A He told everybody never to go to
15 Diane, not me specifically. In Saturday
16 morning meetings, which every dealership in
17 America has a sales meeting, this has been
18 brought up or mentioned numerous amounts of
19 times, do not go to Diane about it, about
20 anything.

21 Q Did you comply with that demand
22 from Chris Orsaris?

23 A Sure. I follow orders.

24 Q Take a look at the Richard Simon
25 letter. Look at the paragraph labeled Number

1 A.B. Nelson

2 2. It says he earned extra money by
3 assignment as a supervisor. Who put you in a
4 supervisory role?

5 A I was never a supervisor. If you
6 really want to know what the term is, it's
7 not -- I was never a supervisor and I was
8 never a manager.

9 Q In your response to codefendant's
10 request for the production of documents, you
11 had said --

12 A What exhibit is that?

13 MS. LILBURN: The documents or
14 the interrogatories?

15 MR. KATES: This is the response
16 to the production of documents.

17 MS. LILBURN: Off the record.

18 (A discussion was held off the
19 record.)

20 MR. KATES: Can I have this
21 marked as Exhibit Q, please.

22 (Whereupon, at this time, the
23 reporter marked the above-mentioned
24 document as Defendants' Exhibit Q for
25 identification.)

1 A.B. Nelson

2 Q If you go to Paragraph Number 11
3 on Page 2.

4 A Yes.

5 Q Take a look at the third sentence
6 on the third line, at the end of the third
7 line beginning with the word also. Do you see
8 that?

9 A Yes.

10 Q I devised a system to determine
11 stock numbers and locations of inventory lots
12 which also took me away from the sales floor.
13 Do you see that, Mr. Nelson?

14 A Yes.

15 Q Who asked you to devise this
16 system?

17 A I told you earlier that I did it
18 because the store was not running properly.

19 Q Did anybody from Mitsubishi
20 Motors North America ask you to do this?

21 A No. No.

22 Q Take a look at Paragraph 13. It
23 says I never complained to my customers about
24 my boss's belittling behavior towards me.

25 A Yes.

1 A.B. Nelson

2 Q Who were you referring to when
3 you say my boss?

4 A I was referring to Chris Orsaris.

5 Q Did you ever notify anybody at
6 Mitsubishi Motors North America about this
7 discriminatory behavior that you allege in
8 your complaint?

9 A Not about the discriminatory
10 behavior, but other things, but not about the
11 discriminatory behavior.

12 MR. KATES: Can I have this
13 marked, please.

14 (Whereupon, at this time, the
15 reporter marked the above-mentioned
16 document as Defendants' Exhibit R for
17 identification.)

18 Q Mr. Nelson, have you ever seen
19 this document that is before you?

20 A Have I seen it?

21 Q Yes.

22 A I am the one that made it.

23 Q What is this document marked as,
24 what exhibit?

25 A R.

1 A.B. Nelson

2 Q Read the first line of that and
3 let me know when you are done.

4 A Yes. I read it. Go ahead.

5 Q Who is the they that is being
6 referred to here?

7 A These were notes to myself at the
8 time.

9 Q Who is they?

10 A When I refer to they, that means
11 I'm referring to Chris Orsaris and anybody
12 else along with him.

13 MR. KATES: Can I have this
14 marked, please.

15 (Whereupon, at this time, the
16 reporter marked the above-mentioned
17 document as Defendants' Exhibit S for
18 identification.)

19 Q Mr. Nelson, are you looking at
20 Exhibit S?

21 A The tax statement?

22 Q Yes. What is this document that
23 is before you?

24 A This is the 2018 federal tax
25 return statement.

1 A.B. Nelson

2 Q Would you agree that this is a
3 W-2 wage statement?

4 A A W-2 wage form, yes.

5 Q On the bottom it talks about the
6 employer's name and there are two boxes at the
7 bottom in Section C of each one. Do you see
8 that?

9 A Yes.

10 Q It has Victory Auto Group, LLC.
11 What work did you do for Victory Auto Group,
12 LLC?

13 A Sell Mitsubishi vehicles, go and
14 train some Mitsubishi salesmen at Mitsubishi
15 Larchmont, you know, how to do the walk-
16 arounds, how to do the Diamond deliveries,
17 sell cars.

18 Q You would train people?

19 A Yes.

20 Q Who authorized you to perform
21 this training?

22 A They wanted me -- when they
23 couldn't get any -- when they do -- I was
24 authorized by my superiors to do that.

25 Q Who were your superiors?

1 A.B. Nelson

2 A Chris Orsaris.

3 MR. KATES: Can I have this
4 marked, please.

5 (Whereupon, at this time, the
6 reporter marked the above-mentioned
7 document as Defendants' Exhibit T for
8 identification.)

9 Q Mr. Nelson, are you looking at
10 Exhibit T?

11 A Yes. It is labeled as letter T.

12 Q On the bottom it says A. Nelson
13 121?

14 A I guess that's what you would
15 call the Bates stamp.

16 Q This is a sales commission slip
17 and your name is listed as a salesperson and
18 then it has the vehicle description, which is
19 2014 Hyundai Elantra, 2013 Mini Cooper.

20 A Yes.

21 Q What role did Mitsubishi Motors
22 North America play in you selling either one
23 of these cars?

24 A Those cars, when they are bought
25 or bought at auction or whatever, those cars

1 A.B. Nelson

2 are serviced and done by Mitsubishi service
3 technicians.

4 Q My question is different.

5 A What was your question?

6 MR. KATES: Read the question
7 back, please.

8 (Whereupon, at this time, the
9 requested question was read by the
10 reporter.)

11 A What role did Mitsubishi play?

12 Q In you selling these cars?

13 A In these cars here, okay. All
14 pre-owned vehicles that are not Mitsubishi go
15 through the Mitsubishi service department.
16 That's their role.

17 Q When you sold it --

18 A When I sell it afterwards.

19 Q Do you get compensation from
20 Mitsubishi Motors North America when you sell
21 a 2014 Hyundai Elantra?

22 A No. I'm selling a used vehicle.
23 Like any dealership, they have off brands from
24 the brand that they're actually selling.

25 Q But they are not paying you

1 A.B. Nelson

2 anything when you sell a 2014 Hyundai Elantra?

3 A Nobody would.

4 Q What do you mean nobody would?

5 You don't get a commission when you sell a

6 2014 Hyundai Elantra?

7 A No. No. It's not from

8 Mitsubishi. That's what I'm saying.

9 Q So you would get a commission
10 from Victory; is that correct?

11 A Of course.

12 Q Mr. Nelson, do you know if
13 Mitsubishi Motors North America ever ran a
14 background check on you?

15 A Did Mitsubishi North America --
16 nothing to do with this organization. This is
17 the first store I ever worked on and never had
18 a background check. Any other store that I
19 worked in, they had background checks, drug
20 test and everything.

21 Q My question is had Mitsubishi
22 Motors North America ever run a background
23 check on you?

24 A No.

25 Q You said earlier today that you

1 A.B. Nelson

2 were terminated. Did Mitsubishi Motors North
3 America terminate you?

4 MS. LILBURN: Objection.

5 A No.

6 Q Did they supervise your daily
7 activities, meaning did Mitsubishi Motors
8 North America supervise your daily activities?

9 A I answered that.

10 MS. LILBURN: Just answer it
11 again.

12 A No.

13 Q Mr. Nelson, do you have any
14 social media accounts?

15 A Sure.

16 Q Do you have a Facebook account?

17 A Sure.

18 Q Do you have a MySpace account?

19 A MySpace?

20 Q Yes.

21 A I don't think anybody has that.

22 I have Instagram and I have Facebook.

23 Q Have you ever posted anything
24 regarding any of the named defendants on your
25 social media accounts, including Facebook and

1 A.B. Nelson

2 Instagram?

3 A What do you mean?

4 Q Have you posted anything in
5 regards to Victory Mitsubishi?

6 A Advertising of cars and showing
7 when you sell a car, so you're showing what
8 you did in your work so everybody else can
9 come and possibly you can get a sale out of
10 the people that put hits showing your love on
11 Instagram and they may come and buy one.

12 Q Have you ever posted anything on
13 your social media accounts regarding your
14 claims in this case?

15 A No. I don't do that kind of
16 stuff. That's for children. I don't do that.

17 MS. LILBURN: I believe we are at
18 seven hours on the record.

19 MR. KATES: Fine.

20 MS. LILBURN: I would also like
21 to clarify with respect to the exhibits
22 that were premarked.

23 MR. KATES: I would just like to
24 make a statement for the record before
25 we go to that. I object to the

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A.B. Nelson
deposition closing. I was not given a
full opportunity to ask all the
questions and I will make the
appropriate application to the judge.
(Time noted: 6:15 p.m.)

2

3

6 COUNTY OF)

8

9

10 certify that I have read the transcript of my
11 testimony taken under oath in my deposition of
12 September 13, 2019; that the transcript is a
13 true, complete and correct record of my
14 testimony, and that the answers on the record
15 as given by me are true and correct.

17

18

19 Signed and Subscribed to
20 before me this ____ day
21 of _____, 2019.

22

23 Notary Public, State of New York

24

25

1

2

I N D E X

3

WITNESS

PAGE

4

ANTHONY B. NELSON

5

Examination by:

6

Mr. Hans

4

7

Mr. Kates

280

8

9

E X H I B I T S

10

DEFENDANTS'

DESCRIPTION

PAGE

11

A

EEOC Intake Questionnaire
9/21/17

4

12

B

Two-Page EEOC Complaint
June 2018

4

13

14

C

Eight-Page Complaint

4

15

D

Ten-Page Defendants' First
Set of Interrogatories for
the Plaintiff

4

16

17

E

Eleven-Page Plaintiff's
Response to Defendants'
First Set of Interrogatories

4

18

19

F

Two-Page Letter 5/15/19

4

20

G

Six-Page Text Messages

4

21

H

Two-Page Tax Return 2018

4

22

I

Sales Commissions

4

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S
(continued)

DEFENDANTS'	DESCRIPTION	PAGE
J	Letter 9/18/18	4
K	Twelve-Page Card Activation and Check Balance	4
L	Six-Page Document	4
M	Letter 7/25/19	221
N	Document	292
O	Certificate of Completion	308
P	Two-Page Tip Sheet	309
Q	Plaintiff's First Response to the Request for the Production of Documents	331
R	Document	333
S	Tax Return 2018	334
T	Sales Commissions	336

INFORMATION AND/OR DOCUMENTS REQUESTED

DESCRIPTION	PAGE
Reservation of right to depose Mr. Nelson on second page of EEOC filing	31
Names and addresses of any customers that would support allegations in complaint	98 103
Telephone number of James	102

1		
2	INFORMATION AND/OR DOCUMENTS REQUESTED	
	(continued)	
3	DESCRIPTION	PAGE
4	Names and addresses of anyone else that	
	knows Mr. Lettas made comments	111
5		
6	Production of phone found; expert to	
	examine video	114
		117
7		
8	Any other racially-motivated statements	
	made by Mr. Lettas	118
9	Copy of recording with Robert Wood	126
10	Names of any other witnesses to racial	
	and age comments	128
11		
12	Names of any other witnesses to Mr.	
	Orsaris harassing Mr. Nelson and caused	
	hostile work environment	139
13		
14	Identity of person/persons assaulted by	
	Manny	195
15	Further deposition of Mr. Nelson after	
	review of new documents	236
16		
17	New document version of May 15th letter	260
18		
19		
20		
21		
22		
23		
24		
25		

1

2

C E R T I F I C A T E

3

4 STATE OF NEW YORK)
5) ss
6 COUNTY OF NEW YORK)

7

8 I, ALISON DUNNE, a Shorthand Reporter
9 and Notary Public within and for the State of
10 New York, do hereby certify:

11 That ANTHONY B. NELSON, the witness
12 whose examination is hereinbefore set forth,
13 was duly sworn by me and that this transcript
14 of such examination is a true record of the
15 testimony given by such witness.

16 I further certify that I am not related
17 to any of the parties to this action by blood
18 or marriage and that I am in no way interested
19 in the outcome of this matter.

20


21 IN WITNESS WHEREOF, I have hereunto set
22 my hand this 26th day of September, 2019.

23

24



25


ALISON DUNNE

ERRATA SHEET

NAME OF CASE: _____

DATE OF DEPOSITION: _____

NAME OF DEPONENT: _____

The following corrections, additions or deletions are noted for the following reasons:

PAGE	LINE	CHANGE	REASON
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Subscribed and Sworn to Before Me
This ____ day of _____, 20__.

WITNESS' SIGNATURE

NOTARY PUBLIC

Commission Expires:

LAWYER'S NOTES

[illegible]

Bee  **Reporting Agency, Inc.**
COURT REPORTERS

A		
A.B 5:1 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1 145:1 146:1 147:1 148:1 149:1 150:1 151:1 152:1 153:1 154:1 155:1 156:1 157:1 158:1 159:1 160:1 161:1 162:1 163:1 164:1 165:1 166:1 167:1 168:1 169:1 170:1 171:1 172:1 173:1 174:1 175:1 176:1 177:1 178:1 179:1 180:1 181:1 182:1 183:1 184:1 185:1 186:1 187:1 188:1 189:1 190:1 191:1 192:1 193:1 194:1 195:1 196:1 197:1 198:1 199:1 200:1 201:1 202:1 203:1 204:1 205:1 206:1 207:1 208:1 209:1 210:1 211:1 212:1 213:1 214:1 215:1 216:1 217:1 218:1 219:1 220:1 221:1 222:1 223:1 224:1 225:1 226:1 227:1 228:1 229:1 230:1 231:1 232:1 233:1 234:1 235:1 236:1 237:1 238:1 239:1 240:1 241:1 242:1 243:1 244:1 245:1 246:1 247:1 248:1 249:1 250:1 251:1 252:1 253:1 254:1 255:1 256:1 257:1 258:1 259:1 260:1 261:1 262:1 263:1 264:1 265:1 266:1 267:1 268:1 269:1 270:1 271:1 272:1 273:1 274:1 275:1 276:1 277:1 278:1 279:1 280:1 281:1 282:1 283:1 284:1 285:1 286:1 287:1 288:1 289:1 290:1 291:1 292:1 293:1 294:1 295:1 296:1 297:1 298:1 299:1 300:1 301:1 302:1 303:1 304:1 305:1 306:1	307:1 308:1 309:1 310:1 311:1 312:1 313:1 314:1 315:1 316:1 317:1 318:1 319:1 320:1 321:1 322:1 323:1 324:1 325:1 326:1 327:1 328:1 329:1 330:1 331:1 332:1 333:1 334:1 335:1 336:1 337:1 338:1 339:1 340:1 341:1 a.m 1:12 68:19,21 87:14,18 Aaron 259:21 261:2 ability 7:21,24 99:17 100:22 183:4 183:8 217:21 able 5:14 8:7 15:13 25:20 27:22 87:3 98:8 100:8 101:3 103:17 111:19,25 118:21 128:11 139:10 167:3,25 184:15 189:5,22,23 194:9 195:10 218:5 304:3 above-mentioned 4:5 220:24 292:21 308:14 309:15 331:23 333:15 334:16 336:6 above-noted 1:17 absolute 273:19 absolutely 61:7 90:18 91:21 139:13 268:12 abundance 48:12 accept 260:7 access 73:11,14,17,25 74:5,6,17 117:17 226:3,7,18 231:13 246:3 accessing 222:4 accidentally 27:19 account 222:5 230:7 339:16,18 accounts 339:14,25 340:13 accurate 32:25 33:2 accuse 77:20 accused 83:22 84:2 201:21 202:11 202:14 203:15 205:5,10,24 253:12 accuses 84:3 accusing 79:24 84:11,18 205:21 acronym 317:6 326:5 act 34:10 187:13 262:25 263:2 acting 130:4 217:12,12 action 32:2 34:8 64:5 81:19 258:25 272:13 275:2 346:16 Activation 344:5 activities 339:7,8 activity 79:8 147:22 228:4 268:24 329:4 actual 24:9 92:13 167:14,23 247:22 Adarem 164:15 165:8,13 add 92:15 126:16 135:12 250:18 added 109:22 260:25 addition 105:19 128:13 additional 27:10 110:20 111:6 135:11 137:19 235:25 255:25 address 4:19 8:11 86:23 90:18 94:15 96:17,20 99:19,21 101:9 112:2,4,10 addresses 90:14,15 103:18 344:20	345:4 adequate 76:17 251:6,10 adjacent 293:9 administrative 156:5 Advertising 340:6 affect 7:21,24 128:16,22,24 182:22 183:4,8 affiliate 308:6 afraid 155:11 156:25 157:22 171:18 215:2,15 216:2,4,7,16 217:7 African-American 34:15 afternoon 280:10,11 against 1:4 age 22:4 34:18,21,24 35:2,9,10,12 35:14,17,18 36:3,5,16 37:2,5 38:9,10,23,24 39:3,8 40:4,4,5,6 40:17,21 41:4 42:13 43:4 45:22 45:23 46:7 80:2,5 120:6,21 126:8 128:2 254:18 265:8 285:11,15 345:10 age-related 36:13 66:5 agency 156:3,6 159:9 aggravated 241:20 275:22 agitated 195:7 ago 5:12,18 6:16,22,23 11:13 15:4 15:8 29:25 32:14 38:17 115:14 165:12,12 175:8 176:9 242:8 255:8 265:16 269:24 284:7,9 agree 62:12 64:12 129:19,22 130:19 139:3,17 178:2 232:11 233:3 234:6,8 235:2 267:2 268:11,15 335:2 agreed 3:4,11,18 201:13 269:23 273:7 agreement 103:16 112:12 ahead 8:22 29:17,18 39:17 57:17 151:25 288:22 334:4 ain't 146:13 208:16 Akbar 242:18,19,20 alcohol 209:19 alcove 191:16 alerted 278:15,16 312:20 313:25 Alex 1:6 2:9 33:7,13,19 50:11,13 50:17 52:10 53:7 54:12 56:24 73:10 104:13,20 105:17 106:16 106:17 107:14 114:2,6 120:12,19 124:9 126:20 127:16,18,18 128:15 130:13,20 155:2 178:11 212:6,8,13,19 213:6,7,15,23 215:25 272:9 273:2 325:20 Alex's 120:7 265:7 alike 162:19 Alison 1:18 346:7,24 allegation 85:14 92:19 167:4 276:18 allegations 64:4,9 65:15 89:15 91:2 94:17 97:15 98:10 102:18 103:19

152:13,25 155:22 213:8,15 214:6
291:13,25 292:6 321:6 322:3
authorized 335:20,24
auto 1:6,7 2:9,10 16:15 34:2 64:23
67:7 119:8 206:16 247:4 307:3
307:11 335:10,11
automobile 49:23
automotive 9:5 10:11
available 138:23 139:19 255:3
Avenue 2:16 185:14 209:3
Aviles 243:21 245:10,14
aware 27:24 89:18 109:12,15
134:21 278:7,8,11,12,17 314:6,7
314:9

B

B 1:2,15 4:9,18 22:17,22 24:6
25:14,21 33:11,15 76:25 77:7,8
104:12 132:9 161:14 172:11
174:2,3,4,4 206:23,24 207:3,4
215:6 266:3,25 326:10,11 342:9
342:17 343:4,9,12 344:2 346:10
babies 113:4,17
back 7:8 24:14 27:5 29:11 44:2,3
53:21 61:15,24 76:24 77:20
78:11 85:3 96:13 121:13 122:7
124:2 125:13 138:14,16 151:22
151:25 171:12 187:24 192:2
196:18 211:25 212:3,4,5,11,19
212:21,23,24 213:3,8,9,20 214:8
214:9,10 216:2,3,18,19 217:8,15
217:18,24 218:4,11 219:4 230:18
249:10,16 262:17 263:5,9,11,13
263:22 264:11,12,13,17 269:20
283:23 284:13,14,16 288:25
294:19 301:2 307:20 327:10
337:7
background 338:14,18,19,22
backwards 18:10,11
Bacus 47:10,15,16 298:16 325:11
bad 77:21 79:24 85:11 130:7,8
144:11 156:18 157:22 159:21
160:19 273:20
Badugas 166:8 167:19
bag 189:18 288:23
balance 227:23,23 228:3 344:5
balances 224:6,20,20
Baltimore 317:21
bank 224:10,10 299:15 300:7
bankruptcy 177:12
banks 300:21
barrier 20:24
Barry 280:19,21
base 88:24 89:2,4
based 39:9 40:22 45:22 46:7 79:8
82:20 111:10 134:10 142:23
146:16 147:23 153:15 178:5,6
201:22 202:12 203:15 205:25

213:18,19 254:16,17 261:25
276:22,25 285:7
basic 280:15
basically 46:16 77:15 122:2,19
169:24 224:14 246:4 247:12
254:16 289:5,19 290:19 291:4
basis 35:12,14,16 39:8 62:10 64:21
139:13 154:5 182:7 205:24 206:6
238:2,9 260:5 261:18 300:9
315:21,23,23
Bates 336:15
battery-operated 317:4
Bay 198:3
BDC 51:17 326:3
Beachwood 18:20,20 284:24 285:4
beck 245:24
beep 187:17 188:3
beer 209:9,12,13,14 210:10,11,13
began 328:15
beginning 11:18 67:21,22,22
190:22 328:21 332:7
begins 291:9 328:12
behalf 94:9,23 109:11 165:24
166:2 243:3
behavior 79:9 150:16 332:24 333:7
333:10,11
belief 167:9 182:15 300:9
believe 9:15 22:22 23:10,11 26:17
27:15,23 31:24 33:23 41:12
48:10,17 64:21 68:25 69:7 86:13
86:16 90:11,17,25 91:12 96:24
97:10 103:19 105:7 114:2,3,19
138:12 153:23 154:3 164:4
167:10,11 196:13 199:19 204:8
208:19 210:25 212:6 213:15
214:5 219:12 234:14 235:22
241:23 244:24 245:9,13,16
258:14 259:20 267:23 268:23
270:20 276:17,21,22,25 278:14
279:19,23 281:11 282:25 283:10
285:3 292:15 296:19 301:2
302:20 305:12 325:11 340:17
believed 212:12,25
believes 48:2
believing 154:6
belittling 332:24
belonging 113:12
belongs 27:18
Ben 35:23 36:11,15 39:21 40:6,7
40:13,16 55:17 58:25 60:11,24
61:25 79:21 104:18,25 161:17
163:22 164:18 165:16 166:12,15
166:16 167:5 168:20 177:23
Ben's 40:8
benefits 301:13
berserk 321:15
best 133:23 163:2 258:21 299:11
big 30:16 144:19,22 187:11 190:6

269:23 291:2 293:16
bilingual 21:4,14
bill 35:22 36:11,15 39:20 40:7
58:21,24 60:12,24 61:25 79:21
96:11 104:18,25 161:17 162:8,13
162:20 163:6,9,22 164:6,17,20
165:15 166:12,15,16,17 167:5
168:13 265:9
bills 96:8 182:18 212:11 219:4,9,10
birthday 210:6
bit 27:5 82:16 84:22 130:23 134:8
147:8 195:7
biweekly 250:5
black 34:13,15,21 39:23 119:7,12
119:12,18 162:18 168:23 169:3,9
169:15,23,25 170:11,17,23
210:20
blah 145:5,5,6 241:17,17,17 242:2
242:3,3
blind 162:14
block 80:18 224:14,15
blocked 122:9
blood 8:3 275:21 346:16
blown 195:7
blue 83:17 106:5
BMW 106:7
board 73:10
bodily 188:15
bonus 248:3,24
book 106:5 273:14 286:23
books 312:23
border 113:5
borrow 179:5,7
borrowed 179:11
boss 333:3
boss's 332:24
Boston 185:14 209:3 293:8
bother 26:21
bothered 85:21
bottle 210:8
bottom 133:10 201:14 254:4,6
335:5,7 336:12
bought 12:5 178:17,19 195:2,3,6
209:13,14 210:7 336:24,25
boutique 289:20
box 34:9 39:24 40:17 219:6 233:13
boxes 255:2 335:6
boy 326:11
branch 242:18 283:7
branching 132:5
brand 216:21 337:24
brands 290:10 306:6 337:23
break 17:2 50:20 68:9 87:23,24,25
140:8 226:10 236:15 259:21
297:7,12,12,13,15,21 298:6
breakdown 293:7
breaks 297:9,17,20
Brian 107:20 108:21,22

chief 147:17
children 340:16
Chino 167:20
chip 83:17
choice 272:21,22
Chris 1:6 2:9,21 33:12 36:24 39:19
 52:9 55:12,13 56:24 66:19 69:24
 72:19,24 73:3,10 74:14 75:10
 105:8,9 135:5 136:2 148:7
 161:18 163:8 166:11,24 171:25
 172:4 199:8 205:19 210:17 212:7
 214:18 216:14 217:19 243:22,24
 244:18 245:10,13 246:7 247:3
 255:6 268:8 305:18,20,21 319:4
 319:7,17,18,20 328:14 330:12,22
 333:4 334:11 336:2
circumvent 148:14
City 2:12 13:19 16:9 215:23
Citywide 20:13,14 319:25 320:5,11
 320:15
Civil 34:10
claim 24:25 35:16 36:2,3,6,16
 39:12 136:2 137:3 220:4 251:24
 258:25 261:11 263:12 329:10
claiming 38:22 92:24 259:17
claims 34:8 252:2,3 270:18 285:7
 285:14,15 340:14
clarification 260:22
clarify 27:2 53:16,17 74:5 155:5
 200:17 258:6 282:16 283:25
 340:21
classified 303:7
classify 303:4
clear 95:17
cleared 248:23
client 38:22 39:4,5 43:4 54:13
 85:10 87:13 88:20 89:19 90:17
 112:3 116:12 146:24 207:8
 222:23 223:13 239:9 241:11
 258:11 272:24 303:6
clients 43:18 47:24 54:15 237:19
climb 113:4
climbing 54:7
close 23:12 189:21,25
closed 184:22 210:7
closing 341:2
co-worker 185:3
codefendant's 331:9
coffee 288:25
cold 144:11
collaborative 173:18
collected 186:19
collecting 186:12
college 8:18 9:7,9,10
color 104:15 146:6 154:11 169:25
 317:20
combination 199:14
come 18:16 20:24 36:17,19 44:14

54:13 63:21 73:17 75:16 77:19
 78:14 111:7 122:25 124:9 136:21
 138:24 163:5 172:19 176:16
 177:3,11 185:18 198:24 209:15
 212:21,23 213:3,9 214:8,10
 216:2,2 217:15,18 244:8 249:2,3
 263:13 264:12,13 267:18 284:13
 284:14,16 288:23,25 291:16,18
 300:19 306:13 315:25 317:18
 340:9,11
comes 14:7 105:24,25 120:10
 139:11,13 172:6 204:13 214:19
 290:4 291:22
coming 48:13 111:23 142:10 164:3
 169:11 177:17 208:8 210:17
 211:6 213:20 217:2 281:2 306:12
 306:14,17
comma 175:9
comment 36:25 37:2 39:11 42:3,8
 42:14 46:22 54:24 59:20 66:5
 83:13 146:16 164:18 165:14
 177:14 182:6 237:4
commented 70:3
comments 37:3,9,12,21 38:11,16
 39:9 40:22 41:2 42:14 53:14
 54:25 56:10 57:11,24 58:12,14
 59:2,19,21 60:3,8,12,19,23,23,25
 62:9 69:19 70:4 74:8 79:18,22,25
 80:2 83:20 100:9,23 104:24
 105:12,12,20 107:15,16,19
 109:25 111:17 112:24 118:7
 128:3 130:14 131:9 132:16
 144:13 168:20 170:17 182:22
 183:5 184:2,6,13 345:4,10
Commerce 12:24
commission 12:24 200:4,12 226:22
 250:2,2 254:9 257:15 276:20
 301:16 304:12,13 336:16 338:5,9
Commissioner 3:13
commissions 301:18 343:22 344:15
commit 223:13
committed 222:24
communicated 213:20
communications 74:2 328:2
Community 8:24 9:11 10:9
companies 286:17 327:18,18
company 5:24 83:18 321:18
compensation 43:22 44:16,22
 45:10,22 46:3,4,5 337:19
complain 44:21,24 45:4 102:6
 120:8 181:24 275:6 276:6
complained 44:25 119:21 120:3,4,6
 120:7 157:23 258:20 332:23
complaining 149:19
complaint 22:18 23:7,15 24:7,9,10
 31:25 32:5,6,19,21,22,25 33:14
 37:10,21,23,23 38:6 39:2 40:22
 41:3 44:15,18 54:24 55:2,3,5,19

55:24 59:3 60:9 61:2,4,6,17,20
 61:22 64:5,9 65:15 76:25 79:20
 82:14,15,21 89:15 91:3 94:18
 97:16 98:11 104:19 105:6,14,19
 119:6,16 134:5 135:4,5 144:19
 150:15 155:22 156:21 157:21
 163:21 172:10 204:14 206:14,20
 214:25 215:4,5,8 219:13 254:16
 254:17,21,25 267:4,12 268:4,22
 268:22,23,25 269:3,4,13,14
 270:2,2,6,10,12,14 271:9,13,18
 272:12,13,16,16,22,23 273:2,12
 273:18 274:7,17,20 276:18
 326:24,24 327:4,12,14 333:8
 343:12,14 344:21
complaints 51:24 86:3 104:8 275:2
 275:3,5,10 276:5,14
complete 27:8 44:6 136:25 317:9
 342:13
completed 27:11 137:16
completely 136:17
completion 308:20 344:9
complex 82:6
compliance 312:24
complied 124:24
compliment 145:24
comply 330:21
compose 204:17
composed 204:22
Compound 29:16 128:20
computer 190:8 200:22 227:14
 229:14 230:15 233:13 235:19,20
computers 223:11
concept 152:4 253:13,15
concern 117:16
concerned 144:4
concerning 220:18 221:17
conclusion 222:17
concoct 223:9
condition 113:10
conduct 196:9 275:5
conducted 81:7
confident 111:14
confirm 118:23 231:10,11,15
 239:12
confirming 220:5
conform 237:16
confused 307:16
confusion 239:2
Connecticut 121:15 122:19
connection 93:21
consider 162:10,12 318:7 320:16
consistency 141:25
consistent 182:7
constant 104:21
constantly 39:20 130:8 131:13
 148:3 163:8 176:21 181:18
constructive 277:13

decent 250:8,8
 decide 76:15
 decided 264:13 286:19
 deciding 158:12
 decisions 147:18,21
 Deeds 3:13
 deeply 131:7
 defend 191:25
 defendant 2:15 5:7 28:4 33:8,18,18
 33:19
 defendants 1:8 2:8 33:11 339:24
 defendants' 4:6 107:6 135:18
 220:25 271:24 292:22 308:15
 309:16,20 331:24 333:16 334:17
 336:7 343:10,15,17 344:3
 defending 39:5
 deflected 189:11
 degrade 135:6 328:23
 degrading 135:9
 degree 9:6,8,13 10:10
 deliver 308:25
 deliveries 303:25 335:16
 delivering 311:25
 delivery 309:24 310:9 311:15,18
 312:8
 demand 29:4,6,7,24 91:25 221:14
 258:23,24 330:21
 demands 27:25 71:11 86:2 89:21
 demote 330:9
 demoted 246:5 330:5
 denigrating 52:20 123:10 131:11
 departed 278:10
 department 124:6 126:5 142:16
 326:3 337:15
 departure 21:17
 DePaul 91:11 121:24
 depending 14:9 316:3
 depose 31:17 260:24 344:19
 deposit 229:3
 deposited 230:6
 deposition 1:14 4:24 6:19,22 19:22
 29:9 30:8 34:16 85:24 136:15
 188:22 236:5 237:11,16,21,25
 238:9 281:3,8 341:2 342:11
 345:15
 describe 58:2,3 69:11 71:7 72:8
 80:8 133:19 293:4
 described 82:7
 describes 70:24 71:25
 describing 69:16 79:6
 description 336:18 343:10 344:3
 344:18 345:3
 designated 49:3 115:19
 desk 120:13,15 186:23,25 187:20
 187:24 189:7,7 190:7,12,14,17
 207:22 288:23 296:18,20,21,22
 296:24,25 297:19 322:23
 desks 190:6

detail 102:20 197:19
 detailing 197:24
 determine 332:10
 develop 79:4
 developed 79:5 223:2
 development 51:16 326:5,6
 devise 332:15
 devised 332:10
 diabetes 8:2
 Diamond 301:22 302:24,25 303:25
 312:8 335:16
 Diane 1:5 2:8,20 33:11 52:8,13
 65:5,23 66:4,12,13,15 67:2 72:19
 72:23 73:5,12,14,18,25,25 74:11
 74:18 75:6,12 140:21 148:10,10
 148:21,23 150:4 151:13,16,17
 152:2,5 172:2,3,6 181:3,4,12
 203:4,19 204:5 218:15,19,21,22
 265:12 330:13,15,19
 dictate 176:4
 dictated 174:18,20 175:8
 Dictor 274:22 275:4
 different 9:16 11:5 23:5 48:9 51:6
 51:9,19 82:18 106:5 121:15
 124:8 125:6,7 126:25 127:2
 130:10 133:17 135:15,16 138:20
 168:15 214:3 235:23 238:17
 239:5 242:23 259:2,7 260:2
 262:2 281:13 298:13 316:7 319:6
 337:4
 differently 169:16 170:11
 difficult 324:17
 direct 60:24 170:9 316:18 318:7,9
 directed 58:19,23 59:11,17 60:8
 243:23 244:19 245:14 316:22
 317:9
 directly 19:12 48:22 49:11 50:5
 56:15 226:22
 disagree 267:3
 disagreed 106:8
 discharge 277:13 283:11,14,16
 discharged 24:24 206:17
 disclose 140:4
 disclosures 71:9 86:5
 discovery 27:25 29:4,12,24 31:19
 72:6 86:2 89:20 90:5,8 92:7
 106:20 114:22 124:24 127:15
 136:14 137:16 237:17 256:3
 260:23 272:25
 discriminating 57:19 177:16
 discrimination 6:6 22:4,5 30:16
 35:9,10,13,15,17 36:16 38:9,22
 38:23,24 39:3,8 40:21,23 41:4
 43:4 45:23 51:24 52:5,18 85:11
 92:23 102:25 157:21 174:2
 206:17 254:18 270:15,17,21
 285:11,12,13,16 326:13 327:14
 discriminatory 55:4 56:20 57:15

61:23 62:11 74:8 77:17 276:23
 276:24 333:7,9,11
 discuss 102:21 265:13 275:9 284:3
 discussed 102:22 275:13
 discussion 31:21 72:16 87:15 98:18
 196:6 220:2 221:23 222:11
 239:14 266:7 272:4 275:15 277:7
 280:2 282:10 331:18
 disgruntled 120:18
 disgusted 121:18,19 122:8 183:2,4
 dishonorable 283:12,13,16
 dismiss 302:18
 dispute 114:22 116:9
 disputing 118:3
 disrespect 78:8 104:2 162:25
 disrespected 129:6
 disrespectful 58:4,5 78:12 93:6,10
 129:15
 disrespecting 130:4 162:24
 distracted 134:13 304:2
 distractions 130:9,10 182:20
 district 1:1,1 5:22,23 254:25 316:6
 327:12
 disturb 91:19
 disturbed 141:13
 DMP 18:15,20
 dock 317:21
 docket 5:14
 doctor 184:7,9,14 274:22 275:7,8
 275:17 276:4,7,10,11,13 287:25
 document 29:7 30:6 32:11 34:23
 34:24 71:10,12,16,21 72:6,7,13
 99:16 173:23 180:8 220:25
 221:13,13,16 222:2 224:24 227:7
 227:13,16,21 231:11,23 232:2
 233:22,25 234:20 235:13,23
 236:3,24 237:23,24 239:17 260:9
 260:10,12,14,25 261:3,10 279:12
 279:13 292:22 293:2,6 308:15
 309:16 326:20,21,23 331:24
 333:16,19,23 334:17,22 336:7
 344:6,8,13 345:16
 documentation 70:23,23 310:20,22
 310:25 311:6
 documents 4:6 30:2,3,4,6 71:4,6
 89:20 90:10,13 91:6,8,13,14
 92:18 96:10,22 97:21,23 98:12
 98:14 99:7,10 100:7 106:24
 220:18,20 221:6,8,9,11,15,17,21
 236:5,7 237:12,15,17 238:5
 254:8 260:23 279:11 281:3,4,6,9
 300:11,12 331:10,13,16 344:12
 344:17 345:2,15
 Dodge 290:10
 doing 12:19 14:2 55:15,22 75:3,17
 129:7 131:16,18,19 134:11 141:2
 142:18 144:6 145:23 146:4
 148:11 149:23,24 153:23 159:2

71:8 72:2 131:2,6,10,12,23,24
132:11,13,15,21,22 133:2,3,6,18
133:19,21 134:3,7
excluded 78:20 286:4,12
excuse 17:9 233:15
exhibit 22:9,17,21 23:3 24:6 25:14
25:21 26:4 27:4,7,9,12 28:4 29:9
30:7,10 31:24 51:21 76:25 77:6,7
104:12 107:2,8,10 126:22 132:9
135:18,20 161:14 172:10 174:2
179:22 196:8 202:23 206:14
220:25 222:7,8 223:22 224:2,25
226:17,20,25 227:7 231:6,6,18
232:6,9 233:20 238:17,18,21,25
239:3,4,21,24 240:3 251:16
254:4,4 258:4 266:3,25 292:22
292:25 296:12 308:11,15 309:13
309:16,20 326:10 331:12,21,24
333:16,24 334:17,20 336:7,10
exhibits 4:6 127:9 340:21
exist 52:6
exit 320:20,21
expand 38:4 79:11 273:17 310:15
expanded 272:17
expansion 23:14
expect 165:24 236:8
experience 133:22,23 144:24
expert 115:3,20 116:15,24 117:2
125:18 126:15,18 345:5
explain 7:15 23:4 76:3 77:13 78:4
86:16 116:6 133:12,18 143:23
172:22 197:2 252:12 263:21,23
explained 24:13 152:3 171:23
173:21 225:19 262:19 265:23
explaining 93:4 138:5 173:20
249:23 250:11
explains 133:13,16
express 13:23 141:9
extent 140:24 222:16 251:24 284:2
extra 331:2
eyeball 75:17
eyes 31:6 32:10

F

F 135:18 251:16 254:4 258:4
343:19 346:2
F&I 185:9
face 109:2 187:21 188:5,6,10
Facebook 339:16,22,25
fact 26:20 83:23 89:19 92:18
142:19 197:12 205:9 213:19
216:24 217:8 225:21 234:13
267:3 268:12,18,21 269:23,24,25
271:17 274:16 294:18
facts 38:2 207:4 274:19,21 328:8
fairly 268:12,17 269:24
faith 139:13 250:6
falls 255:2

familiar 40:12 322:23
familiarization 298:9 308:18
320:12
familiarized 39:22
family 116:20 162:20
family's 12:4
far 43:22 69:23 74:13 75:2,3 120:5
155:2 197:23 243:25 244:17
286:7 294:19
far-ended 217:3
fast 280:16 282:3
faster 231:24 236:20
fear 158:3 215:18
fearful 216:9,10,11,13
feature 162:19
features 78:4 162:21
February 73:6 74:18 78:19,25
152:21 328:12,14
fed 121:15 277:17
federal 34:8 219:12 254:9,20
334:24
feed 148:11
feel 8:6 115:25 156:8 161:23
176:21 190:21 218:14
feeling 288:2
feet 190:24 191:10
fell 108:25
fellow 11:19 42:22 102:17 106:7
felt 21:11,12 111:14 145:12 146:17
150:2 217:19
fifteen 50:18
fifteen- 297:11
fifth 26:16
fifty 68:4,5
fight 189:24 194:10 207:17 208:12
262:11,13
fight 169:11 194:13
figure 259:22
figured 38:4 258:12
file 25:20 265:22 267:4
filed 23:7 25:14 26:15 27:19,20
31:25 51:21,25 55:2 119:6,14,15
152:24 155:21 251:17 265:21
267:12 268:25 269:3,3,4,12,13
327:11
files 138:19,19
filing 3:6 30:3,16 37:11,22 39:2
54:24 84:13 173:4 251:17 266:14
327:13 344:19
filings 23:5 88:9
fill 22:13 23:9 25:23 26:3 27:7 34:5
61:17
filled 26:10 27:7,10 29:11 34:6
61:20,21 173:7 323:2,6
final 152:10
finalize 118:23
finally 25:11,20
finance 45:2 47:6,17,18 144:9

185:8 186:3
finances 300:7
find 26:14 29:2 69:10 89:4,6,7,10
98:12,13 130:25 139:25 194:8
196:22 238:6 254:15
finding 30:8 90:15
fine 16:25 39:13 40:19 73:19 82:22
158:8 159:15,24 160:21 169:20
171:4 175:17,24 340:19
finger 188:10
fingers 188:4
finish 7:9 8:21 10:6 26:12 146:8
147:20 166:21 170:7 173:17
242:12
finished 138:5 166:23 242:10
246:11,18 250:22 251:2,14
fire 124:4,5 126:4 154:9,10 214:6
321:18
fired 154:11 157:22 160:7 210:23
211:2,4 212:13,14,15,18,20,25
214:20 215:13
firm 29:25 91:9,10 121:24 220:14
245:6
first 4:12 30:9 37:13,15 43:8 44:25
51:20 52:4 106:23 161:13 189:15
192:19,24 202:21,25 203:6
216:19 222:5,13 229:15,16,19
232:10 247:6 250:4 259:18
269:22 284:22,24 285:4 288:7,9
313:15 334:2 338:17 343:15,18
344:11
fit 274:19
five 53:19 58:18 88:7 131:20 135:2
143:8 145:4 207:2 249:9,12
257:24 284:9
fixed 155:2
flagrantly 106:12
flat 86:9 247:16,17,20
flats 200:5,12 247:15 249:4
flaw 329:21,23,24
flip-flop 122:7
floodgate 162:25 163:15
floor 2:4 26:16 47:13 48:15 51:14
51:14,15 77:20,21 83:23,25
141:13 145:18 187:10 196:23
197:14 198:14 201:4,5 253:6,8
291:18 295:13,15 297:25 298:2
305:14,17,19 306:2 330:7 332:12
Flourney 43:17 47:5
focus 21:15
focused 249:21
focusing 77:25 129:7,8 131:18
folder 23:25
follow 76:22 187:4 191:5,6,9,19
203:17 311:11,25 312:10,14
313:5,9,12,16 319:6,7,8,15,19
330:23
following 319:11

193:4 200:4,11 227:25 228:9,13
 228:16 244:3 247:24 250:5,7
 257:20 260:4 280:10,11 323:20
good-bye 140:23 143:9
goofing 78:15
gotten 135:14 237:12
government 152:14,19,20 156:3
 159:9
grab 289:5
grace 24:4,8
grand 122:4 243:17,18 249:9,12
 257:24
granted 148:4
gray 134:20
great 116:19
greed 276:25
greetings 66:14 75:16 141:2
grew 79:3
grin 177:18,21
grinning 177:25
gross 43:25 247:14
ground 162:8
grounds 285:10
group 1:6,7 2:9,10 34:2 64:23 91:8
 247:4 307:3,11 335:10,11
grown 83:15
grown-ups 217:13
grumpy 37:5 41:5,8,20 42:8,10,25
guess 33:22 63:21 75:10 117:23
 142:9,11 146:13 229:22 254:14
 255:15 293:15 316:5 336:14
guide 310:8 311:5
guidelines 311:25 312:4,5,6,11
 313:17
gun 82:12,15 205:15,20,21,24
 206:3,15 210:23 214:20 215:12
 215:22
guy 36:21 40:16 41:12 77:22 83:18
 106:9 162:14 185:9 192:20 219:6
guy's 265:8
guys 117:14 143:22 191:10

H

H 4:9 343:9,21 344:2
ha 83:9,9
half 46:16 68:8 140:10 155:21
 177:9 300:24
halfway 116:4 211:14
hand 229:21 296:14 346:21
handbook 285:24 286:2,24,24
handbooks 286:14
handed 24:2 279:12
handle 277:16
Hans 2:7,13 4:2,15 18:2 31:15
 47:25 60:16 68:10,14,18,23
 71:15,20 72:10,15 76:21 82:3
 87:6,12,20 95:10,14,18 98:16,22
 114:17,25 116:8,11 117:7,19

124:18 126:10 128:19 139:8,12
 140:9,17 145:9 161:4 167:7
 170:14 175:17,24 185:24 192:9
 195:18 196:5 214:24 220:4,21
 222:10,18 226:15 228:19 231:25
 236:4,12,17,25 237:5,9 238:4,12
 238:16,22 239:3,8 249:18 250:21
 257:3 258:5,9,17 260:20 261:6
 261:12 266:6 270:4,8,11,19
 271:11,15,21 272:2,6 274:5,8,13
 277:6 279:4,7,23 343:6
happen 65:18 92:20 101:6 156:19
 156:20 157:3,23 158:11,13
 160:12,19 186:4 217:4 278:9,24
 314:10 317:13 318:6 321:14
happened 23:15,17 24:3,17,17,18
 24:20 26:14 59:8 73:3 80:17
 93:17,23 99:3 115:15 120:14
 130:6,18,23 143:4 152:11 155:15
 155:20 157:7 159:21 163:12
 169:13,14 171:15 185:22 186:5
 187:8 189:15 191:7 200:8,9,21
 203:12 210:14 211:8 217:10
 218:7,24 224:22,25 241:22 244:7
 247:21 248:2 254:14 255:23
 262:8,13 264:16,25 273:20
 284:11 286:18 322:20 324:15,19
 327:20,22
happening 131:13,15
happens 36:9 114:12 117:8 130:2
 144:23 273:17
happy 69:20 114:22
harassed 131:11 136:3 137:3
 166:25 243:24
harassing 168:14 345:12
harassment 168:13 252:6,9
hard 68:5 134:12 145:25 177:7
Harlem 16:14
harm 188:15
harse 57:25
hats 50:14,19 51:7 214:3 325:21
head 64:18,23 169:5 189:10
headquarters 314:14 315:2,3,4,7
health 128:17 301:13
hear 55:6 64:8 88:11 103:4 123:7
 123:10 126:20 168:4 178:7 208:7
 208:13 252:19 322:10,12
heard 38:10 40:8 49:23 58:12
 60:13 66:5 94:2 99:12 101:5
 127:7 165:22,23 166:3,11 167:16
 168:2 181:18 183:5 187:14
 194:14,16 195:6 208:4,8
hearing 37:12 119:21 132:16
 143:16 324:8
heated 241:18
heavy 18:17
held 1:17 31:21 51:10 61:24 72:16
 87:15 98:18 196:6 220:2 221:23

222:11 239:14 266:7 272:4 277:7
 280:2 282:10 331:18
hello 66:13 74:13 140:23 143:9
 145:16
help 15:13 17:5,15 28:9 33:17 37:8
 95:17 114:22 198:21 249:20
 291:19
helped 243:9
helping 28:24
hereinbefore 346:11
hereto 3:5
hereunto 346:20
hi 75:3
hierarchy 172:9
high 275:22 324:14
high-end 289:21
higher 218:21 324:13
highest 133:25
highly 144:12 162:10 178:3,4
 271:6
hire 213:8 214:6
hired 43:15,16,19,22 214:9 263:21
 323:19
Hispanic 119:12
history 236:2
hit 189:12,12,13 221:14
hits 340:10
hold 34:25 138:14,16 146:8 190:8
 207:5 291:9
holdback 303:16
holding 219:23
hollering 77:18 215:22
home 15:12 82:11 100:4 137:13
 139:20 178:11,13 192:15,17
 207:20 208:18 209:6,18 210:22
 214:20 215:12 249:13 281:12
homeowner 133:24
honest 31:7
Honorable 283:11
hood 172:21
hope 139:23
horrible 38:9 85:11 134:11 182:13
 272:10 273:6
hostile 22:5 77:3,10 78:13,16 80:9
 80:11 81:20 82:7,19,22 83:13
 84:4,14,22 100:22 136:3 137:4
 138:12 166:25 168:14,16,19
 328:16,18 345:12
hostility 77:16 78:2,7,10 79:7,8,13
 88:12 93:3
hour 68:8 140:10 177:9 191:3
 265:16
hours 46:11 63:10,19 68:2,4,5,11
 68:12 140:11 249:13 340:18
house 121:14 122:16 138:19
 207:24,24
hub 13:20
Hudson 1:10 2:4

Jersey 16:2 217:3
 jest 57:24
 job 19:2 20:4,6 51:25 66:21 109:7
 128:16 150:20 151:4 155:11
 156:25 158:15 159:11 171:18
 182:18 209:24 210:5 217:25
 218:2,11 219:4 237:2 266:18,23
 266:24 268:6 269:14 275:11,14
 278:21 279:9 316:22,25 317:10
 322:10,12 325:4 326:8
 jobs 11:16,17 15:10 20:9
 join 121:11 123:14
 joke 53:24 54:2,4
 jokes 52:5,15,16,17,19 53:2,6,8,21
 53:22,22 55:7 56:3 57:12,20,24
 59:3,21 83:4 104:22
 Juan 107:20 109:9,10,13 166:20
 240:10 241:9,10,11
 judge 54:20 116:6 117:9 238:3,10
 259:20 261:2 279:24 341:5
 July 220:13 221:10
 jump 117:10
 jumped 187:20 189:6 215:10
 June 22:22,24 25:13,19 26:21
 202:2 262:9 266:3,14,15,16,25
 267:17 269:2,3,14,19 327:10
 343:13
 jurisdiction 254:7,24
 jury 117:4
 justification 206:5
 justify 131:4,21

K

K 342:2 344:5
 Kates 2:17 280:9,11,12 282:22
 283:23 284:5 292:18 307:19
 308:10 309:12 313:2 314:11
 321:20 323:24 328:3 331:15,20
 333:12 334:13 336:3 337:6
 340:19,23 343:7
 keep 10:5 68:15 89:8 158:5 161:13
 249:18 291:19
 keg 129:6
 Kelly 106:5
 kept 113:3 197:8 304:2
 Kevin 315:24 317:15
 key 90:15
 keys 198:11
 kid 193:18
 kid's 186:20
 kind 5:3 85:25 105:20 162:15
 169:12 185:19 189:7 190:16
 297:7 340:15
 kinds 54:3 114:7 183:11 208:5
 knew 136:19 138:7 146:2 149:4
 157:15 227:13 313:20 322:22
 know 5:17 7:5 13:22 14:4,8,15 18:2
 21:12,19 28:11 30:11 36:11,12

37:5 42:19 44:20 45:6,7 48:11
 49:22 51:18 54:18 58:7 59:14
 62:7,24,25 63:11,13,22 65:25
 66:7 67:6,22 69:25 70:17 74:12
 75:16 76:7 77:17,25 78:9,11,21
 79:3 80:22 85:3,23 86:13,14,16
 86:22,24,25 87:11 88:6,22,23,25
 89:14 92:12 93:5,18,19,20,22
 94:10,16 95:4,8,19,25 96:16,19
 96:25 98:2,15 99:15,18,23 100:2
 100:6,12,24,25 102:3,11,25
 107:23 109:2,22 111:2,3,9,15,16
 114:12 115:6 116:14,14 117:7
 118:20 119:6,14,19,20 120:9
 121:17 122:12,12,22 123:25
 124:11,22,23 125:12,14 126:24
 127:10 128:9 129:16 130:13
 131:13 132:14 133:15,17 134:19
 135:15 137:18 139:6,14 141:5,7
 141:14 142:6,8,12 143:5,5,12
 144:4 145:14 147:7 148:24 149:7
 149:11,12,21,22 150:3 151:5
 153:5 155:3,4 156:9 157:9,20
 159:6,15,16,18,24 160:3,16,18
 160:22 161:22 163:6,15 165:2,5
 165:19 166:3 168:22 169:4,5,8
 169:14,15 174:9,18 175:3,10,11
 179:4 187:15,25 188:14,23 190:4
 190:7,16 191:11 193:8 196:16,17
 197:10,17,24 198:17 200:6,9,24
 203:13,14,21 204:12,16,18,20,20
 204:21,22 205:2 208:15 210:7
 211:4 212:22 213:10 214:5,13
 217:16 221:19 222:20,24 223:4
 223:19 229:16,19,22 230:2,6
 231:5,16,16,17,20 232:3,15
 233:25 236:6 237:5 241:9 242:2
 245:12,16 246:13 247:17 248:16
 249:7 250:22 252:22 254:25
 255:13,16,19,20 256:21,23
 257:19,23 258:9 259:9,12,13
 260:20 261:7,13 266:13,15 267:9
 267:12 270:19 273:14 278:18
 279:5,7 280:13 283:16,24 284:10
 287:8,9 288:23 289:2,21,22,23
 299:23,24 300:5,22,24 301:5
 304:12 306:14 313:25 316:19
 321:9,16,17,19,23,24 322:15,17
 324:24 327:19 331:6 334:3
 335:15 338:12
 knowing 247:22
 knowledge 37:16 167:14,23 170:4
 170:9,10,21 204:16 299:11
 known 280:17
 knows 116:16 128:2 194:22 195:13
 195:23 314:9 345:4

L

L 4:9 222:7,9 223:22 224:2,24,25
 226:17,20 227:2,7 231:6,6,18
 232:6,9 233:20 238:17,18,25
 239:4,21,24 240:3 342:2 344:6
 labeled 221:16 303:2 304:9 330:25
 336:11
 Labor 264:20
 lady 80:18 188:22 225:3 322:23
 LAG 28:10,20,25 260:11
 land 189:6
 language 20:24 77:21 79:25 83:25
 166:4 172:16
 Larchmont 198:5 324:11 325:14
 325:17,18 335:15
 late 11:21 197:12 216:25 217:4,5,6
 237:18
 Latingua 167:21 240:11
 law 35:4 91:8,10 121:24 245:6
 laws 283:17
 lawsuit 64:16,17,20 65:7 102:24,24
 103:2 144:15 270:7 272:19
 273:12
 lawyer 28:11,16,19 30:13 110:15
 116:16 139:25 146:3 152:13
 156:4 159:10 203:11 242:2
 274:12 326:23
 lawyers 28:23 123:24 220:12
 learn 141:17
 leave 20:21 21:6,17,18,20 87:8
 112:8 134:15 241:10 277:12
 278:20 284:11,12 288:2
 leaving 23:20 279:9
 left 10:3,9,10 14:24 16:11,21 18:4
 18:5 20:7,10,22 21:12,14,20
 106:9 131:15 190:10,11,13
 208:23,25 266:11 269:14 277:15
 278:24,25 286:2 295:3 318:19
 320:5,19
 left-hand 72:14 294:4
 legal 61:22 222:17 280:24
 lemon 102:7
 let's 50:20 58:25 82:11 98:6 124:5
 158:22 159:16,18 177:11 190:18
 200:18 206:12 217:12 225:20
 241:12 248:23 295:8
 Lettas 1:6 2:9 33:7,13,19 50:11,13
 52:10 53:7,13,14,19 54:12 55:8
 55:10 56:4,24 57:12 59:6 60:6
 61:19 104:13 105:17 106:16,17
 109:18 110:22 111:16 114:6
 120:12 127:16,18,18 143:18,24
 177:20,21 178:11 179:6,8,19
 212:6,8,13,19 213:6,7,15,23
 215:25 272:10 273:3 325:20
 345:4,8
 Lettas's 104:17,21 107:14 112:24
 118:9 126:20 128:15 130:13
 176:21,22

165:3 226:5 245:22 292:12 294:15,20 295:14 298:13,14,17 298:18,19,21,23,24 299:2 316:6 325:9 mandate 310:12,13 311:12 mandated 311:10 Manhattan 16:16 Manheim 67:9 manipulation 240:2 Manny 185:6 187:13 189:22 190:23 192:21,22 193:5 194:22 195:9,14 196:8 207:11 208:5 216:14 345:14 Manny's 208:11 Manor 178:8 manuals 198:11 manufacturer 292:9 308:24 March 67:20 MARIA 2:6 marked 4:3,5 22:9,17 31:24 107:2 202:22 220:22,24 222:8 224:24 226:16 292:19,21,25 308:11,14 309:13,15,19 326:11 331:21,23 333:13,15,23 334:14,16 336:4,6 marriage 346:17 Maryland 14:8 match 225:5,12,14,21 227:4 230:11 231:15 232:11,25 234:7,21 235:3 235:7 matches 135:15 material 92:15 117:18 matter 62:6 126:13 149:4 216:24 217:8 237:13 277:2 294:17 346:18 McCAMBRIDGE 2:14 MDID 224:4,16 226:8 242:23 mean 7:16 9:21 13:25 49:18 53:9 57:5,20 69:23 74:5 76:2 77:13,15 78:6 86:17,19,20,21 87:9 89:12 92:19 94:21 111:2 120:5 134:17 155:6,24 156:14 157:15,16 158:9 174:23 178:17 183:16 184:3 191:2,4 203:8 204:8,10 215:7,17 223:5 228:10 229:6 230:22 234:16 245:2,3,4 252:13 253:16 257:8 280:22 281:5 289:9 290:16 294:21 295:25 296:21 297:9 302:10 305:5 313:12 316:24 319:16 338:4 340:3 mean-spirited 57:13,14,18 meaning 54:21 74:6 107:18 172:20 339:7 means 9:24 156:2 172:23 176:25 177:2 222:14 223:7 234:15 245:5 252:11 253:10 289:3 334:10 meant 53:9 75:10 151:8 172:9 189:25 190:2 215:8 222:25 mechanic 9:21 10:14,16	mechanism 100:25 media 339:14,25 340:13 medical 183:25 276:10,11,12,13 medication 7:20,23,25 184:12,15 medicine 184:18,19 meet 116:3 121:24 meeting 219:18 245:20,22 330:17 meetings 330:16 mellow 196:15 memory 96:15 memos 45:16 men 37:6 41:6,9,21 42:25 mention 41:13,16 mentioned 42:5 84:8 88:10 101:22 107:15 121:16,23 125:8 324:12 330:18 mentioning 223:7 Mercedes 142:24 289:23 mess 223:17 message 108:10 messages 23:20 108:8,12 115:12 127:5,8,12,14 255:24 256:2 343:20 messed 113:9 202:25 223:15 281:11 met 30:4 75:15 219:12 221:9 Mexican 113:3,17 Mexicans 155:3 Mia 107:19 108:8 127:16,19,20 194:20,21 195:13,22,24 240:10 241:13,13,15 255:24 256:8 mid 283:10 middle 174:6 212:15 280:19 MILBANK 2:3 miles 20:15 193:16 military 281:18 282:20,24 283:3,4 million 250:14 259:18 mind 38:19 141:8 157:9 160:10 168:3 mine 18:15 101:18 226:8 242:19 300:25 mini 247:19 336:19 minorities 106:13 172:13 176:13 minus 43:25 44:4 minute 19:21 196:19 206:15 214:17 297:12 minutes 88:7 143:8 145:4 159:13 187:3,9,24 191:2 236:21 288:22 misconstrued 200:16,19 misinterpreted 220:10 misplaced 138:21 missing 26:15 34:2,3 125:3 258:15 mistake 30:13,24,25 31:2,8 33:21 33:22 232:12,13,14,16,18 Mitsubishi 1:7,7 2:10,15 33:25,25 41:25 80:22 83:8 92:13 100:16 112:21 122:10 195:3 197:17,22	204:2 216:23 217:2,14 222:4 224:5,7,11,13,18 225:23 227:17 232:13,19 233:2 234:14,17 242:21 280:13 287:13,15,16,18 287:21 288:4 289:6,7,9,11,12,14 290:6,8,13,14 292:5,5 293:18,19 295:18,23,25,25 297:3 298:4,6 298:22,23 299:2,3,16,19 300:6 300:10,14 301:3,9,19,24 302:4,7 302:8,12,16 303:9,19,20 304:7 304:15,20,23,25 305:9,24 306:9 306:12,17,21,23,23,24,25 307:4 307:4,12,24 308:4,4,24 309:7,23 311:21 312:2,8,17,19 313:7,18 314:4,5,13,25 315:2,4,7,19,20,25 316:12,13,17,21 317:7,9,11,17 318:22 319:2,8 320:25 321:15 322:2,4,7,8 323:9,10,11,12,14 324:5,21,25 325:4,5,15,17,17 326:17,19 327:3 328:17 329:2,7 329:10,13,14,16 330:8 332:19 333:6 335:13,14,14 336:21 337:2 337:11,14,15,20 338:8,13,15,21 339:2,7 340:5 Mitsubishi's 303:23,24 306:5 modify 32:21 134:6 modules 308:8,9 moment 100:3 165:17 185:7 277:6 321:13 moments 269:24 Monday 19:24 116:6 294:8 money 21:2 45:7 146:3 154:14,15 179:5,7,11 182:12 196:22 199:4 199:5,12,20,23 217:21 218:3 219:8 223:10 224:6,7 234:16,23 235:8 243:8 246:9 247:5,18 248:19,20,21,23 256:16,22,23 257:6,9,17 260:4 268:10 269:7 276:20 301:23 324:13 331:2 monitoring 309:4 month 146:19 211:20,22 214:11 262:18 263:7 264:2 324:22 month's 249:14,15 months 20:11,20 23:19 29:25 48:11 53:20 67:23 145:5 147:6 240:7 318:19 320:3 morning 32:15 66:14 116:6 140:24 186:7 245:20 288:7,10,18,19,21 330:16 mother 186:20,21 mother's 115:23 motion 302:18 motivated 104:14 109:25 119:22 Motors 280:14 287:16 292:6 295:18,25 299:19 300:15 301:9 301:24 302:8,12,16 303:15,19,20 304:7,23 305:9,25 306:9 307:4 308:5 312:17,19 313:7,18 314:4
--	---	---

Non-Mitsubishi 306:7**non-white** 54:18**nonresponsive** 313:3**north** 1:7 2:15 33:25 193:16

280:14 287:16,18 292:6 295:18

295:25 297:3 299:16 300:6,15

301:9,19,24 302:8,12,16 303:19

303:20 304:7,20,23 305:10,25

306:10 307:5 308:5 312:17,20

313:7,18 314:4,14 315:19 317:8

317:17 318:22 319:3,9 320:25

322:2,7 323:10 325:5,19 326:20

327:3 328:17 329:2,11,13,16

330:9 332:20 333:6 336:22

337:20 338:13,15,22 339:2,8

northbound 209:4**Northeast** 99:25**Notary** 1:19 3:12 4:12 342:23

346:8

notations 5:14**noted** 28:22 227:3 261:14 341:6**notes** 45:16 334:7**notice** 1:17 22:21 37:8 54:15

226:25

notify 297:22 333:5**nots** 290:21**November** 43:11 51:22 52:11,24

55:6,24 56:2,2,16,16,19,19,20

58:11 323:13

number 5:15 23:20 48:18 102:10

197:10 220:17 221:14 224:21

225:9 226:8 227:12,23,24 228:8

229:6 232:15,23 233:4 234:7

235:7 255:12 258:3,23 259:11,13

259:13 260:6 261:22,23 281:10

294:4 330:3,25 332:2 344:22

numbered 227:8,11**numbers** 209:12 223:16,18 224:16

225:7,12,21 226:2,4,4,5,8 227:4

227:18 230:11 231:14 232:11

234:21 235:3 239:19 242:18,23

246:25 258:16 329:25 332:11

numeral 206:22,24,25**numero** 294:6**numerous** 38:15 42:4 54:12 58:15

59:8 60:15 83:5 101:12 122:10

162:5,7,22 171:9 267:25 294:18

330:18

NY 28:20**NYLAG** 254:23**O****O** 4:9,9 308:12,15 342:2 344:9**oath** 32:20 39:14 243:12 342:11**object** 181:17 222:16 237:7 340:25**objected** 139:16**objection** 25:16,25 29:15 30:18

34:22 38:13 39:16 45:24 46:21

49:15 52:2,12 53:3,15 54:5 55:9

55:16 56:11 57:16,22 59:13

60:10 61:3,11 62:3,13 64:6 65:12

65:16,21 67:4,17 73:21 74:4,22

75:21 79:10,14 80:3,14 82:2 85:8

85:15 86:12,18 88:18 89:23

93:13 94:20,25 95:7 101:8

103:25 105:3 121:9,12 123:6

128:18,19 129:21,24 130:16

131:8 132:3,19 135:13 136:18

138:15 139:7,8 142:22 144:21

145:8,9 147:12,24 149:6,9 150:9

151:2,12 152:18 153:2 156:11,16

157:11,25 158:16 160:2,6,13

166:14 167:6,7 168:11 170:13,14

171:19 172:18 175:2 176:17

180:18 181:22 183:19 185:23,24

192:8,10 207:13 213:2,25 216:6

217:22 218:10 219:3 222:15

225:16 227:9,19 229:18 231:22

232:20 233:5 240:21 241:2

244:25 253:14,18 256:20 257:2,3

261:17 263:8,18 264:7 267:6

268:14 270:3,4 271:10,11,19

273:23 274:4,5 279:2,4 306:11

307:13 318:23 329:5 330:10

339:4

objections 3:18 232:4**objective** 182:13,14 219:10**obligation** 39:6 136:13 140:3

267:13,13,15

obtain 118:2**obvious** 234:9**obviously** 38:3 58:22 117:16

169:12 172:4 219:22 230:14

314:7 320:23

occasion 196:10**occasional** 178:7**occasionally** 141:23 142:4**occur** 187:7**October** 256:17,25**offended** 180:10,12,14**offense** 146:6,9**offensive** 94:2 107:15 144:12

162:11,12 178:3,4 271:6

offer 291:13,25 292:7**office** 77:20 112:15 119:3 127:11

145:20 146:22,24 186:18 187:10

191:12,15,15,18 208:9 245:7

256:3 262:14 280:13

officer 3:15**officers** 215:21**offices** 189:7,8 190:3,6**official** 280:23**okay** 7:11 17:18 19:3 23:8 28:7

35:5 38:15 39:21 53:18 54:14

61:8 65:23 67:21 83:3 93:2 96:15

96:17 130:3 131:15 132:23 133:4

152:3 158:22 174:5 179:20 205:8

234:10 248:17 253:3 337:13

Oklahoma 13:19**old** 35:18 36:7,9,21 37:4,6 41:5,9

41:20 42:8,10,25 80:24 113:2

124:21 204:2 265:8 314:19,20,25

315:4

older 41:7**once** 42:6 110:6 255:22 289:6,8

298:23 316:2,11,14

ones 38:18 60:8,25 61:4 110:14,21

167:18 174:17 203:9,10 240:12

256:2,5 273:22

ongoing 124:11**online** 67:9 106:4 311:16**open** 17:4 186:8 215:24**opened** 16:8 315:9**opening** 77:23 163:15**opens** 46:13 162:24**operate** 224:9**opinion** 69:14**opportunity** 61:21 145:7 221:4

341:3

opposition 302:18**optimal** 129:20**options** 291:2,6**Orange** 12:16 314:17 315:14**order** 255:18 317:23,24 318:8,9,16

318:20 319:7,8

orders 319:11,15,19 330:23**organization** 28:10 50:19 64:19,19

65:9 172:9 325:21,24,25 338:16

Orsaris 1:6 2:9,21 25:5 33:13

36:24 38:12 39:19 41:13,15,20

41:20 42:17 47:16,17 52:10

53:13,18 55:12,13 56:4,12,14,24

57:11 58:7,9 59:5 60:6 61:19

66:11,18,19 69:24 72:19,24 73:4

76:24 77:2,10,16 81:7 100:10,19

101:5 135:6 136:3 137:3 140:20

141:5 143:18,23 161:18 162:6

163:21 165:14,20 166:12,24

167:4 168:22 170:11,23 172:11

176:12 177:22 189:3 199:9 200:2

205:19,23 206:4 207:12 210:17

214:18 215:19 216:14 243:23,24

244:19 245:10,13 246:7 247:3

268:8 277:19,25 278:7 305:21

319:4,20 328:14,15 330:12,22

333:4 334:11 336:2 345:12

Orsaris's 42:7 100:22 141:8 168:19**Ortiz** 2:6 72:12 87:16 239:11

279:21 282:11

outcome 346:18**Outlander** 290:25**outside** 88:2 94:3 114:23 129:8**outstanding** 246:16**over-the-counter** 184:17,19

<p> pissed 146:12 pizza 219:6 place 1:18 4:11,21 18:25 41:19,22 41:23,24 99:3 115:19 128:9,10 131:17 153:9 155:23,23,24 185:11,12,13 199:2 215:23 217:4 247:10,15 262:12 278:20,20 307:25 308:25 311:24 328:17 placed 77:3,10 80:8,10 81:19 118:18 328:15 places 44:2 293:17 303:14,15 plaintiff 1:3,15 2:3 4:10 5:7,8 6:3 123:14 343:16 plaintiff's 107:10 135:22 246:22 343:17 344:11 plan 88:16 125:23 250:10 plans 320:8 plastered 306:18 307:24 plate 145:21 246:2 play 306:10 336:22 337:11 playing 239:18 Plaza 198:3 please 4:3,17,20 10:5 11:17 32:5 53:16 60:18 62:16 63:22 81:9 163:5 164:6 190:21 233:16 272:20 292:19 307:20 308:12 309:13 331:21 333:13 334:14 336:4 337:7 plenty 30:5 109:23 146:3 plethora 274:20 plug-in 317:4 plural 84:10 plus 92:17 195:9 podium 45:19 podiums 198:12 point 86:6 152:11 191:12 265:11 268:2 291:14 324:20,21 points 131:25 police 169:11 215:21 Pontiac 15:21 poor 132:15 Portchester 255:21 porters 163:14 197:19 210:7 portion 90:2 321:21 portions 313:3 314:12 328:4 position 43:12 66:22 positions 51:10 positive 70:3 possession 95:13 115:20 125:15 possibility 137:24 157:2 possible 15:15 89:22 95:21 154:23 236:11 244:10 possibly 91:2 97:10 138:25 167:19 167:20,22 318:11,12 340:9 posted 339:23 340:4,12 pot 218:12,16,18 potential 289:25 326:8 pots 218:13 </p>	<p> powder 129:5 power 321:2 Practically 67:5 practicing 113:4 praised 69:18 pre-owned 289:21,24 290:9 306:8 337:14 prefacing 150:7 prejudge 177:6 prejudging 177:6 premarked 340:22 premature 134:20 preparing 281:7 prepped 197:21 prepping 197:20 present 2:19 64:4,7,8 65:14,17 67:14,15,18 117:6 194:12 316:12 317:8 presentable 197:25 presenting 83:17 pressure 275:21 pretty 122:20 123:4 129:4 132:15 142:14 174:21,22 313:21 319:11 322:16 previous 193:6 194:13,22 195:14 previously 324:12 price 133:25 290:16 291:8,13 292:2,7 principal 64:18 66:24 principals 151:9,20,21,24 printed 227:14 229:13 230:14 236:11 printout 71:18 235:25 printouts 222:3 prior 6:21 88:8 131:4 186:16 196:9 196:14 282:17 284:18 priority 150:20 private 116:20,21 privileged 17:20,21 327:25 pro 261:22 326:22 327:8,9,11 probably 5:12 11:21 23:12 30:12 41:17,18 90:20,23 91:25 117:19 119:11 123:18 125:17 134:8 135:2 144:4 146:22 161:25 179:14,15 182:10 188:11 189:10 190:9 191:23 211:20,23 212:9 214:12 247:25 249:2 255:16,17 290:21 294:19 312:21 319:14 problem 68:18 116:5 148:6 265:23 317:19 problems 45:21 46:5,6 72:22 75:9 103:7 169:17,18,21,22 276:12 proceeded 245:21 process 309:24 310:9 311:15,18 322:18 324:7 produce 14:4,6 27:22 29:12 30:2,5 30:22 91:25 111:10 112:3 238:14 produced 29:8 30:3,7 31:19 71:22 </p>	<p> 72:5 127:15 222:3 235:23 237:15 281:14 product 43:13 80:20 83:17 298:8 298:10 304:25 308:17 309:2,3 312:2 320:12 328:9 production 71:17 114:15 198:8 331:10,16 344:12 345:5 products 217:14 289:7 329:7 profanity 83:22 84:4,11,19 147:5 profiling 178:5 program 247:9 301:22 302:25 303:5 project 196:23,25 197:4 198:10 projects 130:10 131:16 133:16 198:19 promise 243:7 prone 196:13 proof 43:3,5 45:20 70:9 159:21 222:9 223:21 232:7 244:21,23 proper 260:12 312:8 properly 332:18 properties 42:2 49:4 293:7 property 300:25 301:2 protect 188:14,16 prove 225:17 proves 225:14 provide 47:24 99:7 133:21 237:23 provided 225:11 227:3 238:10 256:2,5 provisions 308:25 312:9,23 Provost 185:14 209:3 proximity 190:2 psychiatrist 184:4 275:16 276:9 psychiatry 276:3 psychological 183:25 psychologist 184:5 public 1:19 3:12 4:13 215:22 251:21 342:23 346:8 pull 31:5 235:18 264:24 305:25 pulled 129:14 305:14,16,18 pulling 316:9 pulls 210:17,20 pump 210:18 punch 189:9 191:21,24 192:2 288:11 punched 207:11 purchase 69:21 70:2 133:20 134:2 purchased 51:12 98:25 99:6 purchaser 50:17 51:13 106:5 purchases 133:20 purpose 31:4 142:6 308:7 315:11 pursuant 1:17 89:20 pursue 39:7 pursuing 254:12 push 182:19 289:7 put 23:25 24:8 26:3 31:3,4 33:23 33:24 34:21,21 37:25 38:2 39:7 58:25 60:8 61:22,25 68:6 82:18 </p>
--	---	--

regards 340:5
 regular 275:7,8,17 289:22 290:11
 regulations 286:16
 rehired 263:20
 related 9:16 79:12,15,16 221:16
 227:13 346:15
 relating 6:13 30:2 37:4
 relationship 75:13 171:6 245:8,10
 release 117:21
 released 294:23
 relevance 283:21 284:4,6,8
 relevant 30:5 99:13 106:2 115:9
 117:18 125:15
 remark 36:20 83:16 177:16 245:23
 remarks 35:18,21 36:13,14 55:17
 56:21 57:2 62:11 78:12 120:18
 129:15 182:16 265:8,8
 remember 6:21,25 15:19 18:22,23
 18:24 19:15,16 37:18 38:17,18
 38:19 39:13,14 41:10,12 42:19
 42:23 47:3,4,8 50:25 51:2 69:4
 79:2 80:4 81:5 85:7,20 86:25
 94:4 99:11 100:22 103:5 111:9
 123:17 146:21 165:11 173:5,10
 175:7 180:3 193:19 194:18
 213:24 230:4 278:17 284:8
 294:17 323:21
 remind 181:25 327:24
 reminding 10:6
 remove 126:18
 removed 200:8,9,11 201:4,5
 remunerated 301:18 304:25
 reoccurring 217:17
 rep 316:12,17,21 318:22 319:9
 repeat 7:15 45:25 89:24 97:7
 155:19 269:10 310:9
 Repeatedly 38:14
 repeating 89:8
 rephrase 166:18 175:25
 replied 28:2 29:7
 report 49:2 56:6,8 156:5
 reported 48:24 49:25
 reporter 1:19 4:5 90:3 220:24
 292:21 307:23 308:14 309:15
 331:23 333:15 334:16 336:6
 337:10 346:7
 reporting 48:22 49:11
 representation 114:24
 representative 173:8 174:11
 represented 285:20 302:17
 representing 85:24 87:22
 represents 280:13
 reprimand 312:16,18 313:4,6,8,19
 314:5
 reprimanded 312:15,22
 request 237:23 238:2,9,11 295:6
 318:3,4,21 331:10 344:12
 requested 28:3 90:2 307:22 337:9

344:17 345:2
 requesting 237:25
 required 312:7,15
 requirement 310:16,21 311:4
 312:6
 requirements 310:18
 resentful 199:5,11,19
 Reservation 344:19
 reserve 31:16 139:10
 reserved 3:19
 reside 8:10,12
 resides 8:14
 residing 4:10
 resolve 6:8,9
 resources 5:10 6:2 19:5 158:22,24
 158:25 159:4
 respect 98:23 104:13 110:21
 116:19 118:24 126:7 135:5
 226:25 263:20 340:21
 respected 163:9
 respecting 163:16
 respective 1:16 3:5
 respectively 4:7
 respond 118:13 136:16 159:7
 259:14 272:24
 responded 136:19
 responds 252:22
 response 23:21 203:24 259:24
 268:8 271:24 331:9,15 343:17
 344:11
 responses 69:25 106:23 107:5,9,10
 135:19,22 179:22,24 246:22
 258:8
 responsibilities 298:12
 responsible 64:25
 responsive 221:15 314:12 321:21
 328:4
 rest 102:13 279:15,18
 restate 246:20
 restaurant 145:18
 result 144:14 184:13
 resulted 154:21 158:15
 resume 322:19 323:4
 resumed 68:22 87:19 98:21 140:16
 226:14 280:8 282:14
 retaliate 252:16,17,23 253:21
 retaliated 251:21
 retaliating 253:4
 retaliation 216:12 251:25 252:4,10
 252:11,14,18,21,24 253:9,10,16
 253:20
 retired 23:24 265:24
 retrieved 281:10
 return 334:25 343:21 344:14
 reveal 114:10 327:25
 review 32:6 70:8 72:5 90:4,9,10
 126:9 236:6,13,16 239:9 281:3
 305:6 345:15

reviews 305:4,9
 revisit 282:18
 revolving 136:23
 reward 303:12
 rewards 222:4 276:20 302:25
 303:5,14 304:9
 rice 40:8,8,16
 Richard 202:19,20 205:7 266:9
 330:24
 ride 23:23 209:5
 ridiculous 130:4
 right 7:21 10:4 19:15,20,21,25
 21:15,23 24:23 29:21 31:16
 37:24 38:5 39:18 47:25 50:22
 51:5 52:23 54:2 62:14,18 66:2,3
 67:25 72:25 81:16 92:3,3 95:6
 106:16 111:9,10 112:21,22
 116:14,17 117:13 118:4,17,20
 119:4 126:19 128:5 133:13
 134:20 139:10,17 145:25 150:2
 157:4 158:23 161:6 162:11 163:4
 177:24 187:2 188:25 189:3,4,5
 190:16 191:16 194:4 195:12
 196:24,24 197:4,6 199:9 200:18
 203:6 204:24 205:22 207:24
 208:25 215:14 218:7 221:20
 225:2,4,4 228:22 231:3 235:5
 239:7 248:7 249:23 253:5 266:10
 272:6 274:22 291:10 293:14
 294:6,6,12 296:22 299:18 301:7
 302:19,25 305:21 306:8 310:24
 312:5 316:10 326:2 327:21
 328:10 344:19
 Rights 34:10 35:4
 Rite-Aid 184:21
 Road 185:14 209:3 293:8
 robbed 270:24
 Robert 77:22 119:25 120:2,4,14,22
 120:23,25 121:3,3,4,7,11,13
 123:25 124:17 125:21 126:22
 127:22 345:9
 Rochelle 198:4 325:19
 Rodney 104:21
 role 47:22 306:9 331:4 336:21
 337:11,16
 rolled 143:15
 Roman 206:22,23,25
 room 26:17,18 32:12 33:23 87:8,15
 88:2 98:18 282:10
 Rooms 189:14
 rope 316:9
 rough 134:11 275:14
 Route 15:21 16:2
 rude 79:17
 rules 262:22,23 286:16 312:13,14
 run 12:14,15,21,23 338:22
 running 77:19 79:24 332:18

<p>sheet 309:20 310:3 311:13,14,15,16 311:18 313:6,9,10 344:10 shit 123:24 shocked 146:2 187:13 193:7 short 23:22 68:17 179:10 257:24 shorter 214:14 Shorthand 1:19 346:7 shot 177:13 shoveled 286:7 show 22:8,16 29:6 31:23 53:19 54:7 69:9 106:25 124:9 141:23 202:22 219:16 221:20,21 222:7,8 223:25 224:25 225:22 227:6 235:13,15 236:2 239:17 290:2 showed 114:5 122:5,7 showing 228:7 340:6,7,10 showroom 136:23 185:13 showrooms 293:10 shows 128:8 222:3 223:22 224:2 228:4,5 236:24 sick 121:14 side 49:5,6 106:11 185:13 209:4,4 241:12 294:4 sides 48:25 49:7 sign 190:8 signed 3:11,14 201:13,14,16,18 204:24 342:19 silent 188:4 silver 42:21 similar 235:24 239:4 Simon 202:17,18,19,20,24 204:7,16 204:24 205:7 206:2,3 266:9 330:24 Simon's 204:23 simple 158:4,17 170:18 187:23 202:7 simply 18:3 29:13 SINGER 2:14 singular 227:5 sips 210:13 sir 7:3 8:22 10:5 22:20 25:9 27:13 27:23 33:6,9 38:6 40:8 66:20 69:12,13 73:2,23 76:17,18 81:14 82:13 84:17 85:7,12 86:15 89:3,9 97:6 118:14 139:22 140:6 158:17 183:14 199:25 201:11 204:4 220:11 226:19 272:19 293:23 sit 32:19 39:3 49:9 88:21 94:14 95:8 193:21 194:2 195:12 211:4 237:19 291:19 site 224:5,11,13,15,16,17 308:23 309:5 sits 77:23 sitting 30:21 39:18 74:25 120:9,13 129:5 165:10 194:4 266:17,19,20 situation 20:25 85:20 91:20 158:24 195:8 210:24 243:25 327:20 six 20:11,20 135:2 292:13 320:3</p>	<p>Six-Page 343:20 344:6 sixth 328:21 sixty 191:23 size 54:19 skinny 41:11 slip 336:16 Slow 199:11 slowed 198:8 slower 15:23 small 189:8 190:4,6,7 210:8 smart 187:19 smirked 171:11 smoked 189:17 smoothly 142:15 snipid 83:16 snow 155:17 snuff 32:23 so-called 322:24 social 223:15,17 224:21 225:8,11 226:7 227:4,17,22 230:10 232:10 232:15,22 234:21 235:3 281:10 330:3 339:14,25 340:13 sold 96:9 101:24 142:24 248:2,24 249:2,7 290:9 299:22 303:9,21 303:24 306:10 309:2,3 337:17 solely 55:8 58:19 somebody 21:4 25:14 37:4 40:2,17 42:11 61:23 69:15 73:7 83:15,24 111:15 114:13 129:2 134:16 141:17,18 152:12,17,25 153:22 153:22 155:22 156:4 157:20 162:16 172:16 182:25 198:4,6 204:13 241:23 242:12 243:16 252:16 253:21 264:24 276:2 287:12,14,17 291:21,24 297:5,22 312:15 317:16 321:18 322:2,6 somebody's 142:24,25 someplace 216:20 321:16 son 75:10 148:7 165:23 188:17,18 291:18 sons 75:11 soon 29:13,22 111:19 186:25 sorry 10:8 13:16 17:8 20:5 25:18 77:8 103:4 164:21 166:22 188:25 202:20 215:9 252:19 sort 39:25 50:4 200:7 324:10 sounds 147:20 178:3 source 256:18,19,24 south 325:19 southbound 185:13 209:4 Southern 1:1 5:22,23 327:12 space 34:4 spaces 33:20 Spanish 119:13 Spartan 1:7 2:10 34:2 286:4,10 307:2,11 326:2 speak 21:10 28:19 87:23 88:2 94:4 94:9 108:6,7,14,21 109:10</p>	<p>145:13 148:2 151:7,8 161:5 165:24,25 172:6 218:22 240:18 242:7,9,13,14 287:23 speaking 46:12 78:17 101:14 105:10 148:13 168:17 276:2 313:16 spearheaded 122:11 special 317:12 specialist 18:17 43:13 80:21 83:8 328:9 specializing 18:18 specific 25:3 29:5 41:19 71:12 80:10,11,12 81:5,6,9,11,24 82:9 324:19 specifically 39:10 202:9 330:15 specifics 248:8 speculate 199:18 speculating 158:7 speculation 156:17,21 158:9,10 speech 155:9 278:22 spelling 14:13 spic 106:14 spike 162:9 spin 203:11 spiral 153:24 154:6 spiraed 153:20 spoke 63:25 73:18,18 74:12 80:6,7 108:4 109:11 143:11 240:15 241:9 242:6,15,17,18,19,20 243:2,5,6 255:7 256:11 282:16 299:5 322:22 spoken 126:7 145:15 168:8 240:13 255:5,10 sport 143:7 290:11 sprawling 293:16 Square 2:11 ss 342:5 346:4 SSI 310:10 staff 119:12 stair-step 301:22 stamp 266:25 336:15 standard 312:9 standing 186:18 190:3,11 210:16 standoffish 145:13,14 stands 326:5 stapled 286:25 start 11:18 21:25 27:6 78:18 82:11 105:22 107:14 143:23 149:18 161:21 162:24 177:25 217:12 289:2 313:15 started 51:23 52:4,11 53:18 55:25 56:18 58:8,9 67:14 68:14 73:9 78:24 79:2,4,4,6,19 122:22,24 161:24 162:2 189:15 193:19 208:2 268:24,24 285:24 289:8,13 starting 265:9 state 1:20 4:13,16,19 14:5,5 35:4 131:23 135:5 215:24 223:12</p>
---	--	---

140:12 143:14 146:23 149:12
 154:24 158:11 165:22,22 169:7
 169:18,20 171:2,4,5,5,6 174:10
 180:9,15 182:25 195:13 200:2,10
 215:20 245:18 254:19 261:5
 263:24 275:20,20,23 277:4 293:3
 297:6,23 300:6 302:23 313:21
 316:9 318:14 320:18 321:24
 329:13 330:23 339:15,17
Suzuki 289:17,19 323:15,16,16,18
swear 39:14
swing 188:17 189:11
sworn 3:12,14 4:12 32:20 346:12
swung 188:11,13 189:15
system 198:20 329:22,23 330:2
 332:10,16

T

T 4:9 336:7,10,11 342:2 343:9
 344:2,15 346:2,2
tabulated 275:25
take 11:23 16:25 24:7 29:6 32:5
 37:7 54:6 55:25 57:13 62:15 68:3
 68:8 97:22,25 112:11 117:2
 118:21 120:24 124:12,15 129:17
 132:9 135:21 145:6 146:6,9
 154:12 161:14 184:12,15,17
 185:10 196:23 197:18 207:25
 217:15 226:9 236:15 249:9
 251:16 255:17 265:7 271:15
 287:4,6,9,10,19 297:10,17,19,21
 298:6 308:23 311:8 326:10
 330:24 332:5,22
taken 1:15 68:20 69:20 121:2
 140:14 226:12 280:6 330:6
 342:11
takes 150:20
talk 17:2 62:19 74:19 76:4 78:6
 83:9 87:7,12 102:5,17 107:14
 117:25 121:3 137:5 141:19
 143:22 145:3,7 146:7,17 147:8
 148:5 150:21 152:4,6,17,25
 169:2 171:24 204:6 208:4,13,16
 218:5,8 241:13,13 242:20 271:12
 292:10 311:22
talked 21:9 79:22 97:14 101:15
 103:15 108:2 121:4,21 125:16
 143:7 147:7 168:22 240:23,25
 254:4 268:7,11 272:9 308:17
talking 15:3,5 24:18,21 28:6 35:5
 35:21,25 38:20 40:3,5 52:16,19
 52:23 53:23 54:8 58:22,24 59:18
 65:25 71:21 73:9 105:7,9,10
 106:22 120:12 122:17 127:6
 144:8,11,13,15 152:21 165:11
 171:7 173:23,25 174:4 175:7
 179:19 188:7,9,19 196:20 197:23
 199:8 201:8 202:18,23 205:17

206:21 228:14 233:17 238:4
 246:12,14 249:19 270:5,7 272:7
 272:7 273:2 290:5 319:18 323:13
 325:25
talks 271:3 309:9 328:20 335:5
tall 41:11 42:22
tanked 304:5
tape 211:5
task 316:22,25 317:10 319:5
tax 334:21,24 343:21 344:14
taxes 250:7 257:25
Taylor 77:22
Tech 8:24 9:12
technical 117:15
technically 118:2
technicians 337:3
Telecommunication 5:10 6:2 19:5
 19:7,9,12 284:23
telephone 186:22 225:3 273:14
 344:22
tell 8:16 9:23,24 10:15 11:17 23:4
 28:16,23 35:20 38:12 39:7,23
 47:4 53:5 55:14 61:12 62:4,6,17
 65:20 67:18 81:11,21 82:25 83:7
 83:20 110:16 142:12,13 145:3,5
 148:15 150:25 152:12 153:16
 154:7 158:6,21 161:23 163:5
 171:7,17,20,20,22 175:18 176:15
 176:24 180:17,19,25 185:21
 199:19 201:20,23 207:19,22
 212:20 213:8,16 214:22 222:13
 231:8,9 240:25 241:18 242:16
 243:16 244:9 256:16 258:2 267:8
 267:15 268:2 270:13 275:18
 277:11 283:13 284:6 288:18
 297:24 307:2 322:19
telling 29:10 55:22 74:3,10,20
 115:7 161:2 162:17 175:14 181:4
 181:6 200:20 208:13 213:22
 214:2 309:7
tells 38:2
ten 5:12,18 6:16,20 47:20 48:11
 96:21 128:9 159:13 193:16
 243:17
Ten-Page 343:15
term 40:12 180:5 259:3,7 260:2
 331:6
terminate 264:8 321:2,4,7 322:3,7
 339:3
terminated 208:19,21,22 262:3,4,6
 262:7 263:12,16,20,21 264:3,4
 264:14,16 339:2
termination 261:16,19,21 262:25
 263:2
terms 286:6
terrible 147:10
terrorist 201:21 202:12,14 203:3
 203:15 205:6,10,25

test 311:9 338:20
testified 4:14,24 6:18 54:4 74:20
 76:16 82:8 84:18,20 92:21,25
 103:14 107:16 112:25 118:7
 132:14 133:5 135:10 151:11,13
 151:15 152:22 154:20,21 155:10
 166:5 170:17 172:12 181:13
 201:6 218:16,17 243:9 263:6
 270:16 284:17 296:17 305:13
 319:22 325:20 329:8 330:4
testify 5:4 7:22 8:7 40:14 62:17
 63:18,20 73:17 94:22 95:18
 243:2,5
testifying 7:10 105:4 150:10
 163:24
testimony 32:20 38:25 40:20 65:10
 67:13 70:10 74:3,21,23 88:10
 93:8 94:18 97:4 99:9 105:11
 107:22 131:5 132:17 135:10
 140:19 148:23 166:11 171:16
 181:8,9,16 182:17 190:20 231:16
 243:22 244:18 248:18 262:25
 263:19 277:24 284:20 330:5
 342:11,14 346:14
tests 308:23
Texas 54:8 113:5
text 108:8,10,12 115:11 127:5,8,11
 127:14 255:24,25 277:18,25
 343:20
texted 187:16
Thank 110:18 296:15
Thanksgiving 43:10
theft 221:16 239:16,17,23 254:5,13
 329:9,16
thief 223:20
thing 13:22,24 14:2,3 55:21 85:4
 93:9 120:17 133:7,16,25 142:17
 162:18 198:9 204:22 217:13
 219:10 225:19 248:4 255:20
 273:19 281:11 288:8,10 303:23
things 7:4 35:18,23 41:5 51:19 54:3
 56:13,15 77:17,19 78:7,12,16
 79:4 82:8 88:11 93:17,23 96:12
 101:12 104:9 106:13 120:21
 121:16 122:10 124:8 130:3
 131:13,14,14 134:11 135:15
 136:14 138:20,22 141:12 149:23
 153:23 154:17,21 163:17 168:12
 180:6 187:4,14 197:8 207:2
 217:6 218:23 242:24 244:16
 250:15 254:17 262:2 272:18
 275:10 281:12,13 289:23 310:18
 311:8,10,23 313:21 322:17
 333:10
think 16:14 22:7 30:15,20 31:11
 39:24 43:10 44:15 47:23 48:4
 53:11 59:16 61:14 76:21 87:3
 97:24 110:11 139:9 143:2 144:17

two 8:18 9:14 20:15 23:4 24:21
26:11 33:18 36:12 38:16 41:25
47:7,9 48:11,25 49:4 53:12 56:25
58:12,17 59:5 64:2 75:11 86:22
87:21 88:3 110:24 125:14 143:8
162:6 165:11 167:2 176:8,8
191:10 195:9 210:13 211:15,18
222:23 224:5 231:14 233:8 242:8
257:24 262:8,11 266:12 279:15
284:18,19 292:14 293:7,10,17
303:19 309:18 317:20 335:6

two-hour 23:23

Two-Page 343:12,19,21 344:10

two-way 178:16

type 52:20 65:2 93:21 104:5 150:13
173:13,14,18 174:19 233:13
305:8

typed 173:10,12,22 174:15 200:23
200:24 201:20 204:7

types 53:8 129:3 288:3 291:15

typical 288:19,21

typing 176:3 201:9

typo 259:10

U

Uh-huh 17:7 214:21

ultimate 144:14

umbrella 306:15 321:18

uncle 35:22 36:11,15 39:21 40:6,7
40:8,12,16 55:17 58:25 60:11,24
61:25 79:21 104:18,25 161:17
163:22 164:18 165:15 166:12,15
166:16 167:5 168:20 177:23
193:18

unclear 123:13

undated 231:17 234:8

underneath 12:14 13:4 65:2,3,4
67:2 205:18

understand 7:11,13,16 17:6,10,16
17:25 32:8 38:7 55:21 60:20,21
64:11 81:22 83:10 100:17 124:7
134:4 139:24 140:5 150:23,24
154:18 158:25 164:3 175:3,15,18
175:22 185:17 188:21 212:17
216:8 223:5 227:15 236:14
243:11 248:9 252:10 253:13,15
253:16 259:14 262:23 263:25
272:20

understandable 190:19

understanding 44:7 264:3 269:22

understands 116:17

unemployed 20:2 21:23

Unexceptional 131:12

Unfortunately 319:10

UNITED 1:1

uno 294:6

unresponsive 141:16 195:19

update 265:22

upper 72:13

ups 289:3

upset 123:4,10

upstairs 26:17 96:13 145:21,23
245:21 322:24

urban 172:20

urban-looking 172:14,15 176:11
176:14

usage 230:18

use 60:19 115:8,18 116:12,18 117:4
125:23 151:23 172:17 180:10
224:8,17 226:23 229:12 230:23
288:13

uses 84:2

usually 252:15 273:18 288:22
300:19

utilize 126:12

V

vacation 286:15,21 287:2

Vague 170:15 257:4

various 71:10

vehicle 13:7 51:13 78:4 80:23
101:10 103:15 133:21 145:22
197:11 290:2,3,13,14,22 303:16
306:16 309:7 310:19 336:18
337:22

vehicles 9:19,20 12:7,13 50:17
51:12 80:22 98:25 99:6 142:16
198:9 200:5 216:21 246:3 289:21
290:9 299:12,13,20,25 300:2,8
300:10,16,19 304:2,12 317:5
335:13 337:14

verbally 215:11

version 252:12 345:16

vicinity 168:6,7 315:12

Victory 1:6,7 2:9,10 15:18 18:5,8
19:2,2,8,11 20:7,10,16 22:3
24:18,19,25 33:25 43:9 46:11
48:15,20 50:3 51:10,23 57:7,8
58:8,9 60:19 62:21 64:23 66:21
67:14,16,19 69:16 70:24 81:6
99:2 101:16 109:13 119:8 121:19
121:22 122:23,24 123:5 134:22
143:13 155:25,25 156:2 193:10
194:23 195:15 206:16 208:23,25
211:12 213:16 214:7 246:8 247:3
264:18 266:13 268:9 276:18
285:24 286:20 287:5 288:6,9
289:13 291:21,25 293:11,12,13
293:18 294:21,24 295:15 297:5,8
298:2,12,18,21,22,25 299:2
301:12 302:11 304:17 305:4,22
306:24 307:3,12 308:4 314:5
315:20 316:13,18,23 317:8
318:21 319:20,23 320:19 322:4,8
322:11,13 323:9 324:5,21 325:3
325:9,14,16 326:2,17 329:14

335:10,11 338:10 340:5

video 113:3,3,7,15,19,22 114:5,11
114:13 115:2,8,10,17 116:12
117:3 118:6 124:10 125:16 155:3
345:6

videos 114:7 116:20

view 114:25 118:4

VIN 197:10

violence 196:13

visible 148:3

visit 315:12,17

visits 142:7

voice 208:10,11

voluntarily 21:6 263:6 277:11

volunteer 103:13

W

W 342:2

W-2 335:3,4

wage 91:7 92:19 102:24 241:11
335:3,4

wages 109:14 278:9

wait 7:17,18 28:15 209:16 242:11

waiting 7:8 28:8 209:15 266:17
289:2,4

waived 3:8

walk 83:10 99:3 143:21 147:5
177:4 178:8 184:20 186:25
288:17,19 291:9 322:18 324:7

walk- 335:15

walk-around 290:5,19,24

walked 32:12 106:9 171:12 187:10
191:14,17 209:2 314:22,24

walking 106:12

walks 289:25

wall 54:8,8 113:4 155:3 219:7

want 21:24 22:16 26:13 29:21
30:11 31:5 32:20 39:6,11 40:11

44:20 47:13 62:7,19 65:5 66:7
68:10 76:9 78:14 81:2 85:3,21
87:6,7,12 91:19 102:12 104:2
107:17 108:18,20 109:8 114:17
114:18,25 115:3,6,18 116:11,22
116:23,25 117:21,22 123:22,23
126:10,12,13 129:4,13 130:12
132:18 133:22 134:3 135:12
141:19 142:8 144:2 153:15,15
156:24 158:6,23 159:11,24
160:22 161:21 171:17 175:25
184:24 190:20 196:19 199:18,18
217:6 219:5,16 222:24 223:3,6
231:8,9,23 236:5 237:11 238:19
238:22,24,25 241:5,16,16 245:16
247:16 248:16 250:17,21 256:12
256:21,23 257:22 260:24 261:4
261:10 273:13,14,15 279:14
282:15 283:20 284:10 309:2,3
312:11 331:6

212-327-3500